### COMMONWEALTH OF PENNSYLVANIA BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

INSPECTION REP	OKI COMMENIS
Date of Inspection 16 September 2002	Identification Number PAD048603005
Company/Facility/Site Name Boyertown Sanitary Disposa	ıl (BSD)
A hazardous waste TSD inspection was conducte Waste Management Specialist with the Department.	d on Monday September 16, 2002 by Gerry Radomski,
The following observations were noted:	
<ol> <li>Both of the treated leachate lagoons and the rathese lagoons determined to be leaking by BS</li> </ol>	aw leachate lagoon were nearly empty. The liners of D have not been repaired.
2) Neither the main flare nor the temporary cand was a moderate landfill gas odor noted in the	le flares were operating during the inspection. There area of the flares.
3) The landfill cover at the pit previously used for	or leachate recirculation has not been repaired.
The following violations were noted:	
<ol> <li>By failing to repair the cover at the leachate re of the landfill cover. This is contrary to 40 CF</li> </ol>	ecirculation pit, BSD has failed to maintain the integrity R §§ 265.111 and 265.310(b)(1).
	and by failing to collect and flare gas from the landfill, te and hazardous waste decomposition products to the
In summary, two violations were noted during the facility operator on the date noted below.	inspection. A copy of this report was mailed to the
notification of any violations observed during the inspection. Additional not herein, or other violations identified as a result of review of laboratory analyses.  This report does not constitute an order or other appealable action imply immunity from legal action for any violation noted herein.	conducted by a representative of the Department. This report is formal stiffication of violations may be issued concerning either violations noted is or Department records. Of the Department. Nothing contained herein shall be deemed to grant or incurrence with the findings on this report, but does acknowledge that the
Person interviewed (signature) copy mailed on 9/19/2002	Date
Inspector (signature)	Date 9/10/07

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# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### INSPECTION REPORT/DATA ENTRY

INSPECTION REPORT/DATA ENTRY								
Site I.D. #	AlDIO14181610131010151	Telephone # <u>C/O - 458</u>	8 - 5300					
	ERTOWN SANITARY DISPOSAL	Operator Name <u>WARREN</u>						
	MERKEL ROAD	Address 1205 10775						
	CE PA 19525	GLENMORE PA	•					
Municipality	DUGLASS TWP	County MONTGOMER						
Responsible Officia	WARREN FRAME	Title OWNER						
Person Interviewed	l	Title						
Inspector <u>GERM</u>	EV RADOMSKI	Time						
Date	Inspection Date Type		or er # Violation					
0/9/1/8/0/2/		] [2]/[3]						
		4 <u>— — — — — — — — — — — — — — — — — — —</u>	<u>. 6151</u>					
Comment								
Sample # Low	Sample # High							
<b>Monitoring Points</b>	s Sampled							
			<u> </u>					
			1 1111					
INSPECT	TON TYPE	FACILITY TYPE						
01 Routine	Municipal		Hazardous					
02 Spill response		pal Waste Landfill 06 Landfill	01 Disposal					
03 Remedial Action	12 Complaint Landfill	oction/Demolition 07 Demolition 08 Processing	02 Treatment					
04 Follow Up	13 Withdrawn 03 Processi	oo motessing	03 Storage					
05 Crit Stage	14 Closure 04 Incinera	5	04 Transporter					
06 Sample Only	4E Deat Classes	Application 11 Surface Impoun	, 1					
07 Permitting	16 Form 4	12 Surface Injectio						
08 Superfund	17 Form 4 w/sample	13 Generator	08 RRR					
09 Ground Water	50 Record Rev	14 SQG	09 Other					
	99 Other		50 Superfund					
			ĺ					

### COMMONWEALTH OF PENNSYLVANIA BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Compa	ny/Facility/Site Name Boyertown Sanitary Disposal (BSD)
Special	A hazardous waste TSD inspection was conducted on Tuesday August 14, 2001 by Gerry Radomski, Solid Waste st with the Department.
	The following observations were made:
	Both treated leachate lagoons were nearly full with approximately two feet of freeboard. The raw leachate lagoon had more than the required two feet of freeboard. The liners of these lagoons determined to be leaking by the facility have not been repaired.
	2) The main flare was not running during the inspection. The temporary candle flares at the rear of the landfill were not burning during the inspection. There was a minor landfill gas odor noted during the inspection.
	3) The leachate seeps in the landfill cover along and above the treatment facility fenceline have been repaired.
	4) The landfill cover at the pit previously used for leachate recirculation has not been repaired.
-	The following violations were noted:
	By failing to repair the cover at the leachate recirculation pit, BSD has failed to maintain the integrity of the landfill cover This is contrary to 40 CFR §§ 265.111(c) and 265.310(b)(1).
se districts	By failing to repair the leachate lagoon liners and by failing to collect and flare the gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR § 265.111(b).
Hodin	
	A copy of this report was mailed to Mr. Frame on the date indicated below.
110D	
coche	od in anding
OFE O	and Makey Control
<b>80</b>	0. 00
notificatio or other v T imply imm S	is inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is format of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein olations identified as a result of review of laboratory analyses or Department records. It is report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or unity from legal action for any violation noted herein. In an action of the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the shown the report or that a copy was left with the person.
Person	nterviewed (signature) copy mailed August 15, 2001 Date

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# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

		INSPECTIO	)N F	REPORT/DATA E	NTR	Y	
Site I.D. # [F] A  Site Name <u>BOYER</u> Address <u>200 M</u> <u>CILCENT CVICE</u> Municipality <u>100</u> Responsible Official  Person Interviewed  Inspector <u>GEA</u>	ETONN LI ERKEL E P.A WARI	RO 19525 TWP PEN FRAM	Æ_	Operator Name Address /2  Address /2  County: /2  Title /	ne	10-458-5 WARREN FR POTTS TOWN 1 PA 193 TGOMERY VER	PIKE 43
Date  OSITOI  Comment	Insp	pection Date		nspection Facility Type Type		Inspector Number	# Violation
Sample # Low Monitoring Points	Sampled	Sample # I	High				
INSPECT	ION TYPE			FA	CILIT	YTYPE	·
01 Routine 02 Spill response 03 Remedial Action 04 Follow Up 05 Crit Stage 06 Sample Only 07 Permitting 08 Superfund 09 Ground Water	10 Survey 11 Part B 12 Compla 13 Withdra 14 Closure 15 Post Clo 16 Form 4	int swn sure w/sample	Mu 01 02 03 04 05	Municipal  Municipal Waste Landfill  Construction/Demolition  Landfill  Processing  Incinerator  Surface Application	07 D 08 P 09 Ir 10 S 11 S 12 S	lual andfill remolition rocessing ncinerator urface Application urface Impoundment urface Injection Well ienerator	Hazardous  O1 Disposal  O2 Treatment  O3 Storage  O4 Transporter  O5 Permit by Rule  O6 Generator  O7 SQG  O8 RRR  O9 Other  50 Superfund

### COMMONWEALTH OF PENNSYLVANIA BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

Date	of In	spection 11 September 2000 Identification Numbe	r PAD04	8603005		
Comp	oany.	Facility/Site Name Boyertown Sanitary Disposal (BSD)				
Waste		hazardous waste TSD inspection was conducted on Monday September 11, 2 cialist with the Department.	2000 by G	erry Radom	ski, Sol	id
	<u>Th</u>	e following observations were made:			4 ¥	
	1)	Both treated leachate lagoons were nearly empty. A BSD employee was clearly liners were being cleaned in order for inspection and any necessary repartitle liners.	_			
	2)	The raw leachate lagoon had more than the required two feet of freeboard.	٠.	•		,
	3)	The leachate seeps around the treatment facility were dry at the time of the the pit previously used for leachate recirculation has not been repaired.	inspection	n. The landi	ill cove	at
	4)	The flare was not running during the inspection. The gas risers at the rear of to the gas collection and flaring system.	of the land	fill remain t	ınconne	cted
		··· - · · · · · · · · · · · · · · · · ·		٠	•	
	Th	e following violations were noted:	•			
	1)	By failing to repair the leachate seeps and the cover at the leachate recircular maintain the integrity of the landfill cover This is contrary to 40 CFR §§ 26	-			
	2)	By failing to repair the leachate seeps and the holes in the raw leachate lago and flare the gas from the landfill, BSD has failed to control the escape of I decomposition products to the environment. This is contrary to 40 CFR § 20	eachate ar	-	_	lect
				9		
	A	copy of this report was mailed to Mr. Frame on the date indicated below.		•		
•				•		
, .						
,						
or other imply in	tion of violat This i nmunit Signa	inspection report is notice of the findings of an inspection conducted by a representative any violations observed during the inspection. Additional notification of violations may be issue ions identified as a result of review of laboratory analyses or Department records, eport does not constitute an order or other appealable action of the Department. Nothing coly from legal action for any violation noted herein, ture by the person interviewed does not necessarily imply concurrence with the findings on nown the report or that a copy was left with the person.	ed concernin	g either violati in shall be de	ons noted	herein, rant or
Perso	n int	erviewed (signature) copy mailed September 12, 2000	_ Date _			
nspe	ctor	(signature) Sent Pulmla	Date	9/12,	100	
			_	Page	7 of	2



## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection $\frac{9/11/00}{}$	Time start
Name of Inspector GERRY	RADOMSKI
	YERTOWN SANITARY DISPOSAL CO.
	O BOYERTOWN, PA 19525
County MONTCOMERY	Municipality DOUGLASS TWP
Identification number PADO4	8603005
	RREN FRAME
Title OWNER	
Mailing Address 1205 PO77	STOWN PIKE GLENMORE, PA 19343
	610 - 458 - 5300
Name of person interviewed	
Mailing address (if different from a	bove)
Area code and telephone number	
1. Site Characterization:	Treatment Storage Disposal
Check all that apply:	
surface impoundments	☐ tanks ☐ incineration
chemical treatment	☐ containers ☐ BIF
physical treatment	☐ waste piles ☐ recycle
☐ biological treatment	☐ containment bldg. ☒ landfill
☐ Other	Specify
Does the facility generate hazar	dous waste? ☐ Yes ☑(No
2. Does the facility generate nazar	dods maste.
3. Types of hazardous waste produ	uced by Hazardous Waste Number:
4. Are hazardous wastes transport	ed off-site by the facility?   Yes  No

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# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

Date of inspection 12 November 1997	Identification Number PAD048603005, 100550
Company/Facility/Site Name Boyertown Landfill	
A routine inspection of Boyertown Landfill was c Mital and Kevin Bauer, Solid Waste Specialists.	onducted on Wednesday, November 12, 1997, by John
The following observations were made:	
<ol> <li>The raw leachate lagoon appeared to have four four to five feet of free board. Treated lagoon</li> </ol>	r to five feet of freeboard. Treated lagoon B also had A had a ripped liner and appeared to be empty.
2) The flare shed has fallen down.	
<ol> <li>Three gas recovery pipes have been broken of odor was detected in this area of the landfill.</li> </ol>	f on the southern side of the landfill. A landfill gas
4) The pits at the top of the landfill have been fil	led in with soil.
5) The landfill was inspected for any leachate see	eps along its slopes. No seeps were discovered.
6) Waste Management leases space on the landfi site on the leased land.	Il and operates a recycling center and container storage
Just before leaving the site Mr. Warren Frame arr Frame and discussed our findings with him.	ived on site. I explained the purpose of our visit to Mr.
On Thursday, November 13, 1997, I phoned Jim determine when leachate was last discharged from Boyer Boyertown Landfill discharged was on June 25, 1997(52 has to pay his bill and have tests done before he will be a	132 gallons). He then went on to say that Mr. Frame
notification of any violations observed during the inspection. Additional n herein, or other violations identified as a result of review of laboratory analyse.  This report does not constitute an order or other appealable action imply immunity from legal action for any violation noted herein.	es or Department records.  of the Department. Nothing contained herein shall be deemed to grant or concurrence with the findings on this report, but does acknowledge that the
Inspector (signature)	Date <u>13 N 297</u>

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### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

			BUREAL	J OF LAND F	REC	YCLING AND WAST	TE MAN	AGE	MENT		
	INSPECTION REPORT/DATA ENTRY										
Addr Muni Resp	- The Asy	Ner Ile Lyl	tel Road RA 195 ass Tup burren Frau	52 <u>5</u>		Operat Wilking Addres	or Nar s _ 13 nmo _ M	ne 205 00 10 10 10		7	Dristate Emire Contracting I
	Date		Inspection	Date	14		acility Type		Inspector Number	#	Violation
L	11121917	:	पापाम	97		011	06		21124		
	Comment [Q	<u>પ</u>	AKTERL	ماتا الا	<u>S</u>	PECTIC		1			se inv reint
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	INSPECT	101	ITYPE				FA	CILI	TY TYPE		
			_	1	Mu	ınicipal			sidual		zardous
01	Routine	10 1.1	Survey Part B		01	Municipal Waste La			Landfill	01	Disposal
02 03	Spill response Remedial Action	12	Complaint	,	02	Construction/Demo	unuon	07 08	Demolition Processing	02	Treatment Storage
04	Follow Up	13	Withdrawn	(	03	Processing		09	Incinerator	04	Transporter
05	Crit Stage	14	Closure		04	Incinerator		10	Surface Application	05	Permit by Rule
06	Sample Only	15	Post Closure	. (	05	Surface Application	n	11	Surface Impoundment	06	Generator
07	•	. 16	Form 4					12	Surface Injection Well	07	sqg
08		17	Form 4 w/sample Record Rev	!				13	Generator	80	RRR Other
09	Ground Water	50 99	Other					14	sQG	09 50	Superfund (
		,	-							- <del>-</del>	

### COMMONWEALTH OF PENNSYLVANIA BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Date of In	nspection 16 September 2003	Identification Number	r_PAD048603005
Company	y/Facility/Site Name Boyertown Sanitary Disposa	ıl (BSD)	
A Waste M	A hazardous waste TSD inspection was conducted an Amagement Specialist with the Department.	d on Tuesday Septembe	er 16, 2003 by Gerry Radomski,
<u>T</u>	The following observations were noted:		
. 1)	) Both of the treated leachate lagoons and the ra The liners of these lagoons determined to be le	nw leachate lagoon had eaking by BSD have no	the 2 feet of required freeboard.
2)	Neither the main flare nor the temporary cand was a moderate landfill gas odor noted in the	le flares were operating area of the flares.	during the inspection. There
3)	) A new gas destruction system is in the process temporary flares.	of being installed at th	e rear of the landfill near the
4)	) BSD has not submitted to the Department quarquarter of 2003.	rterly groundwater mon	nitoring results for the second
The fo	following violations were noted:	·	· · · · · · · · · · · · · · · · · · ·
1)	Failure to report to the Department the quarter quarter of 2003 for the parameters listed in 40 264a.97(2)(ii).	ly groundwater monitor CFR§ 264.98. This is c	ring results for the second contrary to 25 Pa Code §
2)	By failing to repair the leachate lagoon liners a BSD has failed to control the escape of leachat environment. This is contrary to 40 CFR §§ 26	te and hazardous waste	and flare gas from the landfill, decomposition products to the
In sur acility op	ummary, two violations were noted during the insperator on the date noted below.	pection. A copy of this	report was mailed to the
	in the state of th		
otification or erein, or othe This nply immunit Sigr	is inspection report is notice of the findings of an inspection could be any violations observed during the inspection. Additional notice violations identified as a result of review of laboratory analyses is report does not constitute an order or other appealable action of the interview of the person interviewed does not necessarily imply constitute by the person interviewed does not necessarily imply constitute in the person.	tification of violations may be or Department records. of the Department. Nothing cor	issued concerning either violations noted ntained herein shall be deemed to grant or
erson inte	terviewed (signature) copy mailed on 10/10/2003	- 44 - 44 - 44	Date
	(signature) Self and		Date 10/10/03
. 1 · · · · · · · · · · · · · · · · · ·			Page

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

		•	•			, , ,
Site Name	<u> BSOC</u>	· · · · · · · · · · · · · · · · · · ·	ID Number	PA0048603005	Date	9/16/03

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

	STATUS		,		CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	NUMBER
X				Run-on diverted away from the facility	265.302(a)(1)	H425
×				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
X				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
	•	×		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
_			X	Closure and post-closure requirements complied with	265.310	H431
	X			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	X			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	×			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2 3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	<u>\</u>		Closure plan on the premises and up-to-date	265a.1	265.112	H250
	×		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
	7		Annual closure cost estimate on the premises and up-to- date	264a.1 265a.1	265.142 264.142	H252
	X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

12

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1 :	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	,	×		Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
<u></u>	×			Only Department approved manifest used, unless manifest not required by 40 CFR 262.20(e)	264a.71 265a.71	200.00	H233
. >	×			Manifest properly completed and routed within time limits	264a.71 265a.71	264.71(a)(b) 265.71(a)(b)	H234
	×			Manifest discrepancies resolved or reported within time limits	264a.1 265a.1	264.72(b) 265.72(b)	H235
>	<	-		Written operating record maintained on the premises	264a.1 265a.1	264.73(a) 265.73(a)	H236
>	×	-		Written operating record contains description and quantity of waste received and method of treatment, storage or disposal	264a.1 265a.1	264.73(b)(1) 265.73(b)(1)	H237
>	×			Written operating record contains location and quantity of each hazardous waste	264a.1 265a.1	264.73(b)(2) 265.73(b)(2)	H238
	À			Written operating record contains results of waste analyses and treatability tests	264a.1 265a.1	264.73(b)(3) 265.73(b)(3)	H239
,	X			Written operating record contains reports and details of all incidents that required implementing the contingency plan	264a.1 265a.1	264.73(b)(4) 265.73(b)(4)	H240
,	X			Written operating record contains records and results of all inspections	264a.1 265a.1	264.73(b)(5) 264.73(b)(5)	H241
;	×			Written operating record contains required monitoring, testing and analytical data	264a.1 265a.1	264.73(b)(8) 265.73(b)(6)	H242
>	×			Written operating record contains closure and post-closure cost estimates	264a.1 265a.1	264.73(8) 265.73(8)	H243
;	X			All records retained on premises and available for inspection	264a.1 265a.1	264.74 265.74	H244
;	X			Biennial reports submitted on the Department's version of EPA Form 8700-13B	264a.75 265a.75	264.75 265.75	H245
F		×		Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
			×	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

#### **STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
	X	Ì		Ignitable or reactive wastes separated from source of	264a.1	264.17(a)	H216
			L	ignition or reaction	265a.1	265.17(a)	
	×			No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
			L	from ignitable or reactive wastes	265a.1	265.17(a)	
				Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
	X			or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
	~			Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
	^		<u> </u>	explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	
	×			Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
				immediate emergency instruction to personnel	265a.1	265.32(b)	
X				Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
_				available at scene of operations	265a.1	265.32(b)	
X				Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
_	_			decontamination equipment	265a.1	265.32(c)	· .
}		$\times$		Facility equipped with water at adequate volume and	264a.1	264.32(d)	H223
	_		_	pressure to supply fire control equipment	265a.1	265.32(d)	
i		ر		Facility communications or alarm systems, fire control,	264a.1	264.33	H224
		×		spill control and decontamination equipment tested and maintained	265a.1	264.33	
-				Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
_	X			movement of personnel and equipment during emergencies	265a.1	265.35	
	ı	$\times$		Contingency plan onsite and implemented	264a.1	264.51	H226
_	4	_	_		265a.1	265.51	
	ŀ	$\mathbf{x}$		Contingency plan describes actin taken by personnel in	264a.1	264.52(a)	H227
4	_	_	_	the event of an emergency	265a.1	265.52(a)	
				Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
_				outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
				Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
e l	Æ.	<b>イ</b>		addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	.,
	-  -	<b>y</b>	3	Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
;				including location, physical description and capabilities to each item	265a.1	265.52(e)	
1		$\boldsymbol{\lambda}$	200	Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
$\perp$	* .	3.7	. ]	possibility that evacuation could be necessary	265a.1	265.52(f)	

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

	A - a -	_		and the first of the second of		1 1
Site Name	BSDC		ID Number	PADO48603005	Date	9/16/03
				77.00700		<del></del>

## Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

#### **STATUS**

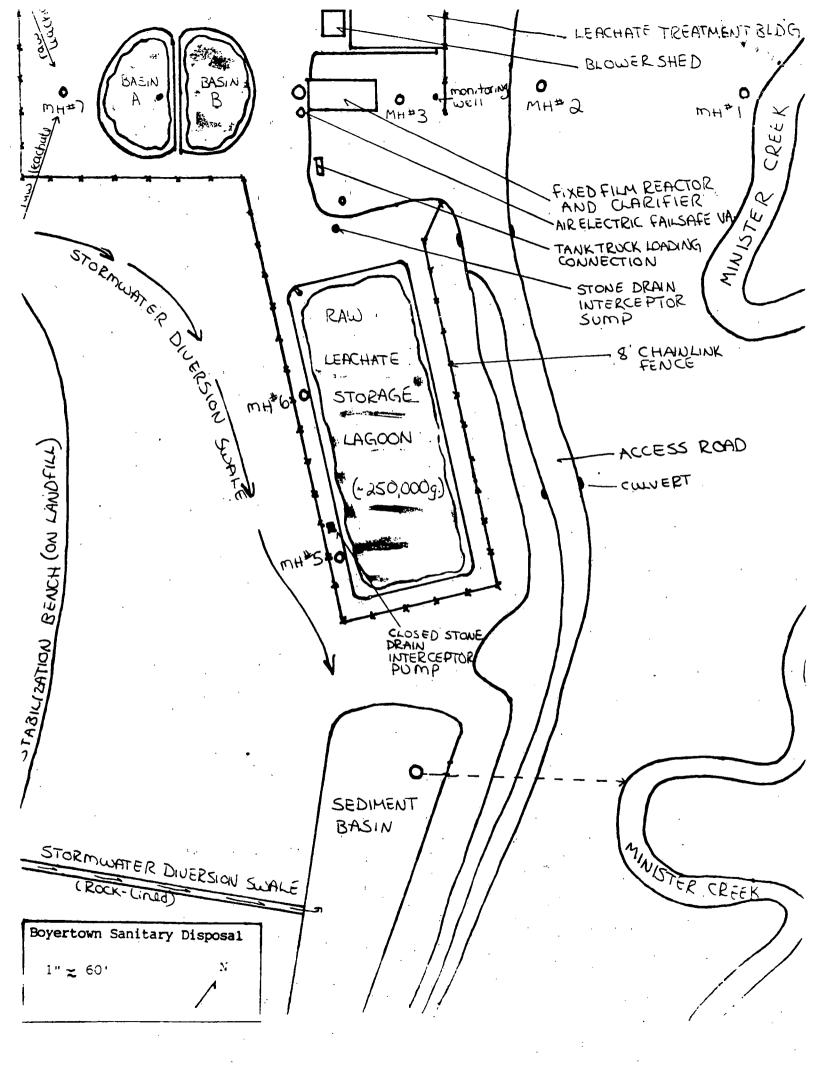
1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	×			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	×			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	×			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	×			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	×		,	24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
×				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
	×			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
7	×			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		×		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		×		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
		×		Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
		X		Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

•				
Date of Inspection $9/16/03$			Time finish	
Name of Inspector <u>GERRY</u>	RADOMSKI	·		
Company, installation name <u>BO</u>	YERTOWN SA	NITARY DIS	POSAL CO	7. RSOC
Location 300 MERKEO	ROAD		·	
County MONTGOMER?		Municipality	OGCASS	TWE
Identification number PAOO4	8603005		•	
Name of responsible official	ARREN FRAME	e <sup></sup>		
TitlePRESIDENT	<u> </u>	·		•
Mailing Address 1205 POTT	STOWN PIKE	GLENMORE,	PA 19343	
Area code and telephone number			- · · · · · · · · · · · · · · · · · · ·	·
Name of person interviewed	· · · · · · · · · · · · · · · · · · ·			<del>.</del>
Mailing address (if different from a	bove)			
Area code and telephone number				
1. Site Characterization:	Treatment	Storage Disp		
Check all that apply:	· .			
	☐ tanks	☐ incineration		
Chemical treatment	containers	☐ BIF	•	
physical treatment	waste piles	recycle		
☑ biological treatment	containment blo	• •		
☐ Other	Specify	• —	•	
•				
2. Does the facility generate hazard	ous waste?	⊠ No		
,		<u> </u>	•	•
3. Types of hazardous waste produc	ced by Hazardous Was	te Number:	•	٠ .
			and the second	
a.				
	,		1 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1	
4. Are hazardous wastes transporte	d off-site by the facility?	P ☐ Yes	No	



Dates of inspection 3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5

4/3,4/13,4/19,4/20,4/25,4/26,5/2,5/4, 1995

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Identification Number PAD 048603005

Company/Facility/Site name _	Boyertown Sanitary Disposal Co., Inc. ("BSD")
12.) 25 Pa Code 265.310(c)(2)	"Closure and postclosure maintenance and monitoring of groundwater monitoring system" Noncompliance observed 4/25 and 4/26, 1995.
It is recommended that Boyerto	own Sanitary Disposal start complying with all the closure requirements for
upkeep and maintenance of the	
•	
	i .
notification of any violations observed du herein, or other violations identified as a re This report does not constitute a imply immunity from legal action for any vi-	ewed does not necessarily imply concurrence with the findings on this report, but does acknowledge to by was left with the person.

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Dates of inspection <u>3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5</u> Ide <u>4/3,4/13,4/19,4/20,4/25,4/26,5/2,5/4, 1995</u>

imply immunity from legal action for any violation noted herein.

inspector (signature)

Identification Number PAD 048603005

Company/Facility/Site name	Boyertown Sanitary Disposal Co., Inc. ("BSD")
5.) 25 Pa Code 265.91(d)(2)	and 25 Pa Code 273.283(b)(6) "Monitoring wells locked" Noncompliance observed on 3/23/95 and on 4/13/95.
	Note: this violation also noted, previously on 6/29/94.
5.) 25 Pa Code 265.226(1)	"(Hazardous waste) surface impoundment freeboard level inspected once each operating day."
7.) 25 Pa Code 265.226(2)	"(Hazardous waste) surface impoundment and surrounding structures inspected weekly"
3.) 25 Pa Code 265.73(a)	"Written operating record maintained on premises."
9.) 25 Pa Code 273.311(a)	"Daily records kept."
	Non compliance observed 3/23 and 4/19, 1995. BSD personnel indicated that records have <u>not</u> been kept since 1994.
10.) 25 Pa Code 265.92(a)	and 25 Pa Code 273.284 "Annual groundwater sampling"  Noncompliance observed on 4/25 and 4/26, 1995.
11.) 25 Pa Code 265.92(a)	and 25 Pa Code 273.284 "Quarterly groundwater sampling" Noncompliance observed on 4/25 and 4/26, 1995.
	Note: the above groundwater violations also noted, previously on 6/29/94

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Person interviewed (signature)

Person interviewed (signature)

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or

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Page / 6 of 1

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Dates of inspection	3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5	Identification Number	PAD 048603005
	AI3 AI13 AI19 AI20 AI25 AI26.5/2.5/4. 1995		

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD") conversation, basin 'A' was filled with treated leachate. This basin was scheduled to be sampled 5-11-95 by Wastex, Inc. **Violations summary** Listed below are all the violations of the Pennsylvania hazardous waste and municipal waste management regulations observed at the Boyertown Landfill, from the period 3/17 to 5/4, 1995. 1.) 25 Pa Code 265.222 "Hazardous waste surface impoundment maintained with a freeboard of two(2) feet." Noncompliance observed on all of the days visited. 2.) 25 Pa Code 265.310(c)(3) "Closure and postclosure leachate management requirements" Noncompliance observed on all of the days visited. 3.) 25 Pa Code 256.56 "Emergency procedures implemented" Noncompliance observed 3/17/95 4.) 25 Pa Code 270.1(a) and Act 97, Section 401(a) "No person or municipality may dispose of hazardous waste without a permit." Noncompliance observed on 3/17/95. This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person. Ir weren Person interviewed (signature inspector (signature)

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

<b>Dates of inspection</b>	3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5	<b>Identification Number</b>	PAD 048603005
•	<u>4/3.4/13.4/19.4/20.4/25.4/26.5/2.5/4.</u> 1995		

appeared to have a minimum freeboard of 8 to 10 inches. Treated leachate

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

basin 'A' appeared empty. Basin'B' appeared full.

May 2,1995 I visited the landfill to observe the leachate basins. The raw leachate basin

May 4,1995 I visited the landfill to observe the leachate basins. The raw lagoon appeared to have a minimum freeboard of 10 to 12 inches. This was the most freeboard in this lagoon since the crisis began on 3-17-95. Basin 'A' appeared empty. Basin 'B' appeared to be about one-third empty.
My inspection on 5-4-95 concludes the visits of PA DER personnel to Boyertown Landfill that are documented on this inspection narrative.
The following information was gleaned from subsequent phone calls:
May 8,1995, I spoke with Jim Brady (BMMA) -Jim Brady said that Wastex, Inc. re-sampled the treated leachate basins 'A' and 'B' on 4-24-95. The results were reported 4-26-95. The Cyanide (CN-) concentration was at an acceptable level and BMMA would permit B to discharge its leachate to the authority's treatment plant. Basin 'A' began to be discharged 4-26-95. By 5-3-95, basin 'A' was empty. On 5-4-95, basin 'B' started to be discharged.
May 10, 1995, from Charlie Fees (PA DER) to Byron Wenger (BSD) -Byron Wenger stated that, as of this
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### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Dates of inspection <u>3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5</u> 4/3,4/13,4/19,4/20,4/25,4/26,5/2,5/4, 1995

Identification Number PAD 048603005

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

April 26,1995 Tom Cunningham and PA DER solid waste specialist, Paul Handke, conducted groundwater sampling at the landfill.

#### Violations observed:

1.) 25 Pa Code 265.92(a) and 25 Pa Code 273.284 "Annual groundwater sampling"

Comment: BSD failed to conduct the annual compliance-monitoring-evaluation (CME) sampling of its monitoring wells. This necessitated the Department to conduct its own sampling of this facility, as evidenced by the sampling event conducted on 4/25-26/95.

2.) 25 Pa Code 265.92(a) and25 Pa Code 273.284 "Quarterly groundwater sampling"

Comment: According to Departmental records, BSD has failed to conduct quarterly (every three months) sampling of its monitoring wells. BSD has not submitted any groundwater data since the second quarter of 1993.

3.) 25 Pa Code 265.310(c)(2) "Closure and Postclosure maintenance and monitoring of the groundwater monitoring system"

Comment: As stated, BSD has not fulfilled its closure requirements in this area since 1993.

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#### **COMMONWEALTH OF PENNSYLVANIA** DEPARTMENT OF ENVIRONMENTAL RESOURCES **BUREAU OF WASTE MANAGEMENT**

#### INSPECTION REPORT COMMENTS

<b>Dates of inspection</b>	3/17. 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5	Identification Number
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r PAD 048603005

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

0.08 mg/lit Cyanide Present from BSD was Byron Wenger 3/24/95 Basin 'A'

0.19 mg/lit Cyanide 4/10/95 Basin 'A'

4/10/95 Between the Carbon Towers 0.33 mg/lit Cyanide

J.Brady stated that leachate with these concentrations of Cyanide are unacceptable for treatment at the BMMA. The BMMA limit is 0.02 mg/lit. Therefore no leachate could be accepted based on these results.

During the afternoon, Tom Cunningham visited the landfill and pulled samples from the raw leachate lagoon as well as from Basins 'A' and 'B'.

PA DER waste management specialist, Maura Trimble, Tom Cunningham, and April 25, 1995 I visited the landfill and prepared for groundwater sampling. Present from BSD was Byron Wenger. It appeared, by visual observation, that the raw leachate lagoon had a freeboard of 6 to 8 inches. I stayed at the landfill for one hour, and then left to attend to other work related business. M. Trimble and T. Cunningham remained onsite. They performed a purging of the monitoring wells located on the landfill property.

It was learned, via a phone conservation with Byron Wenger, that BSD personnel had processed some raw leachate through the onsite pretreatment plant. This was done on Friday 4-21-95. The purpose, according to Mr. Wenger, was to increase the freeboard of the raw lagoon by lowering the leachate level. This provided extra capacity for the lagoon to accept a greater incoming leachate flow, in anticipation of a weekend storm.

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### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

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Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

Dinesh Rakotjia

-engineer

Thomas Cunningham

-hydrologist

Charlie Fees

- solid waste specialist

Byron Wenger was present from BSD. The purpose of this visit was twofold:

- 1. D. Rakotjia and M.Aresary conducted a visual survey of the leachate and storm water basins.
- 2. T. Cunningham and C.Fees measured the freeboard of the raw leachate lagoon. Surveying equipment was used to measure the freeboard levels.

The raw leachate lagoon was observed to have a freeboard of 1 to 3 inches. This was less freeboard than was observed on 4-3-95. Byron Wenger stated that the latest Wastex, Inc. analyses showed that the cyanide levels in both Basin's 'A' and 'B" were too high to be accepted by the BMMA. As a result BSD personnel had pumped some leachate from Basin 'B' back to the raw lagoon. That is one reason why the raw leachate lagoon appeared nearly full (4-19-95) whereas the level was observed to be lower on 4-3-95. This disturbing turn of events precipitated the second major crisis of at this facility.

April 20, 1995 An internal meeting was held at about 10 am. Discussion centered around how to encourage BSD owner, Mr. Warren Frame, comply with Departmental regulations, by properly running the leachate system (as well as adhere to all the other post closure requirements) so as to eliminate the frequent crises situations occurring at this landfill.

Via a phone conservation with Jim Brady (from the BMMA) it was learned that Wastex, Inc., test samples from the two basins yielded the following results:

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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

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Company/Facility/Site	name	Boyertown Sanitary Disposal Co., Inc.	<u>"BSD")</u>

April 3,1995 I visited the landfill to observe the lagoons. Basin 'B' appeared to be three-quarters empty. The raw lagoon had a freeboard of about 1 to 3 inches, by a visual observation.

April 13, 1995 I visited the landfill to observe the lagoons. Basin 'B' was full, that is, with the required two (2) feet of freeboard. Presumably, Basin 'B' was filled with leachate from the raw leachate lagoon. Leachate is pumped from the raw lagoon through the onsite 'pretreatment' plant, and then to either Basins 'A' or 'B'. The raw leachate lagoon itself had a minimum freeboard of 6 to 8 inches, by visual observation. This was not the two (2) feet required by the field compliance order of 3-22-95, but it was the most freeboard since the crisis began on 3-17-95.

#### Violations Observed:

1.) 25 Pa Code 265.91(d)(2) "Monitoring wells locked"

Comment: Monitoring Well no. nine (9) was reported to have no cap lock during the inspection of 3-23-95. On 4-13-95, this well was again observed to be lacking a lock. Pictures were taken of this well.

April 19, 1995 Boyertown Landfill was visited by four PA DER personnel:

Matthew Aresary -engineer

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### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Dates of inspection <u>3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5</u> 4/3,4/13,4/19,4/20,4/25,4/26,5/2,5/4, 1995 Identification Number PAD 048603005

Company/Facility/Site	name	Boyertown Sanitary Disposal Co., Inc.	( <u>"BSD")</u>
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- 4.) 25 Pa Code 265.226(1) "Surface impoundment freeboard level inspected daily"
- 5.) 25 Pa Code 265.226(2) "Surface impoundment, including dikes and vegetation surrounding the dike inspected once each week.

Comment: BSD failed to maintain two feet of freeboard in the raw leachate lagoon, and failed to produce daily records to show that the landfill and impoundments are being maintained properly. Thus BSD is considered in noncompliance with its inspection requirements.

In addition to the above violations, one observation was made which is listed as being a "non-determined" compliance issue:

25 Pa Code 273.201(c)(2) "Gas plan implemented"

Comment: It was observed that the flare house, located at the southeast corner of the landfill was not being utilized. The door of this shack had been completely banged in, allowing easy entry by unauthorized personnel. At time of our visit the flare was not working.

March 24/25,1995 BMMA, received the chemical analyses (from Wastex Lab) of treated leachate from Basin 'B'. After reviewing the data, the BMMA personnel decided that this leachate was suitable for discharge to the municipal treatment plant. The pump was turned on, and the draining of Basin 'B' was begun. Because of the slow flow rate, it would take nearly a week (7 days) to completely empty this basin.

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Person interviewed (signature)	, Copy mailed	to moven Jume Date	7/7/95
Inspector (signature)	Charle 1. 218	Date	7/1/95
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Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

Identification Number PAD 048603005

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lagoon, in accordance with Section 265.222 of the Department's Hazardous Waste Management regulations.

March 23,1995 Carol Sharp, Jay Maneval, and I visited BSD, for the purpose of measuring the freeboard around the raw leachate lagoon. The freeboard is the vertical distance between the waterline and the spot where the liner meets the surrounding grass and dirt. The freeboard measured by C.Sharp and J.Maneval ranged from 0 inches to 12 inches.

李明 经原本分类的 医胸腔潜电影的现代。

#### Violations observed:

1.) 25 Pa Code 265.91(d)(2) "Monitoring wells locked"

Comment: It was observed that well no. nine (9) had no lock. It appeared that the hasp had been ripped off. The cap of this well was easily removed by hand.

- 2.) 25 Pa Code 265.73(a)(b) "Operating record"
- 3.) 25 Pa Code 273.311(a) "Daily records kept"

Comment: Daily operational records were not available at time of inspection. Past records had been taken from the cabinet and thrown on the floor during an act of vandalism. Some of the papers were smeared with oil. BSD personnel indicated that daily records have not been kept since the vandalism that occurred during the Christmas holiday.

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Dates of inspection	3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5	Identification
	AI2 AI42 AI40 AI20 AI25 AI26 5I2 5IA 1995	

Company/Facility/Site name Boyertown Sanitary Disposal Co., Inc. ("BSD")

Identification Number PAD 048603005

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March 19,1995 Carol Sharp visited the landfill. No BSD personnel were observed to be present. She reported that the water level was below the top of the berm.

March 20,1995 PA DER Water Quality Specialist Jay Maneval and I conducted water sampling at BSD.

On this date the stream (minister creek), the storm water sedimentation pond, and the outfall from this pond were sampled.

March 21,1995 Jay Maneval and I continued sampling at BSD. On this date, treated leachate lagoons. Basin A and Basin B, were sampled. The raw leachate lagoon was also sampled. I drove the samples to the PA DER laboratory in Harrisburg. The samples were received by chemist Dennis Neuin. The samples were analyzed for various inorganic constituents, including, but not limited to metals, cyanide, biological oxygen demand (bod), and pH. These parameters are covered under PA DER Bureau of Laboratories Code "210". Analyses specified under this code was chosen to satisfy the request from the BMMA that tests be performed on those parameters that are found in the Environmental Protection Agency's (EPA) Table 'A' analyte list.

March 22,1995 Carol Sharp and Solid Waste Supervisor Robert France hand delivered a field compliance order to Mr. Warren Frame, the owner of Boyertown Landfill (BSD).

This order required Mr. Frame to maintain a minimum freeboard level of two (2) feet in the raw leachate lagoon, in accordance with Section 265.222 of the Department's Hazardous Waste Management regulations.

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Inspector (signature)	Verlee 1. 2 14		ite 7/7/9;
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imply immunity from legal action for any violation noted herein.

Person interviewed (signature)

Inspector (signature)

person was shown the report or that a copy was left with the person.

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Con	pany/Facility/Site name <u>Boyertown Sanitary Disposal Co., Inc. ("BSD")</u>
	Comment: By allowing the raw leachate lagoon to overflow, BSD is in noncompliance with the these regulations. (The overflow situation was corrected on 3-18-95, but the required two(2) feet of freeboard was not attained in the period of time covered by this report.)
3.)	25 Pa Code 265.56 "Emergency procedures: notification of designated response facilities and the subsequent containment and cleanup of a fire, explosion, emission or discharge.
	Comment: BSD personnel did not notify the Department of the discharge of leachate when the raw lagoon overflowed. Also BSD did not initiate any remedial action to contain the overflow. It was PA DER personnel who first reported and responded to this discharge.
.)	25 Pa Code 270.1(a) and
·• <i>)</i>	Act 97, Section 401(a) "No person or municipality may operate a hazardous waste disposal facility without first obtaining a permit from the Department."
	Comment: BSD was in violation of the above regulation/statute when it allowed its hazardous waste leachate impoundment to overflow.
/la	rch 18,1995 In Carol Sharp's inspection report of 3/18/95 she states that she observed Mr. Frame pumping raw leachate from the lagoon into a tanker truck.

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Date

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

#### INSPECTION REPORT COMMENTS

Dates of inspection <u>3/17, 3/18,3/19,3/20,3/21,3/22,3/23,3/24,3/5</u> 4/3,4/13,4/19,4/20,4/25,4/26,5/2,5/4, 1995

Company/Facility/Site name Bovertown Sanitary Disposal Co., Inc. ("BSD")

Identification Number PAD 048603005

•	
The following is a summary of visits to Boyertown Landfill from March to May, 19	95.
At the and of this generations listed the violations of the Denneylyania Hazardous We	acte and Recidual waste

At the end of this report are listed the violations of the Pennsylvania Hazardous Waste and Residual waste management regulations.

March 17, 1995 Relevant to the inspection report of 3/17/95, PA DER Compliance Specialist Carol Sharp first observed that BSD's raw leachate lagoon was overflowing. No BSD personnel were onsite. Back in the office later the same day, the Department held an emergency meeting on how to resolve this situation. The owner of BSD, Mr. Warren Frame, could not immediately reached by phone. The Berks-Montgomery Municipal Authority (BMMA) was contacted. BMMA operator Jim Brady stated that he could not accept treated leachate until BSD conducted a chemical analyses of the treated leachate and submitted them to BMMA. In particular, the BMMA was concerned with the concentration of cyanide(CN-).

At about 6:15 PM Mr. Frame was contacted by phone and informed that the BSD raw leachate lagoon was overflowing. He agreed to bring liquid tanker trucks onsite to temporarily store some of the leachate an attempt to stop the overflow.

#### Violations Observed

Person interviewed (signature)

- 1.) 25 Pa Code 265.222 "Hazardous Waste surface impoundments shall be maintained to prevent over-flowing and the impoundment shall have a minimum freeboard of two (2) feet".
- 2.) 25 Pa Code 265.310(c)(3) "Closure and Postclosure maintenance & monitoring of the leachate collection, removal, and treatment system."

						<del></del>
This inspection report is notice notification of any violations observed therein, or other violations identified as a This report does not constitute imply immunity from legal action for any Signature by the person interviperson was shown the report or that a constitution of the consti	during the insperesult of review of an order or other violation noted his ewed does not	ction. Addition of laboratory and er appealable ad erein. necessarily imp	al notification of alyses or Departr tion of the Depa	violations may be a ment records. rtment. Nothing con	ssued concerning	be deemed to grant o
		-1.1+	Marsha	12.00	200 71	7/95

### COMMONWEALTH OF PERMISYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - SURFACE IMPOUNDMENTS

Site Name	BOYERTOWN	ID Number 🖺	AD 048603005	Date	
	LANDFILL				
	1-No Violation Observed	2-Not-Applicable	3-Not-Determined	4-Non-Compliance	

STATUS			5		CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	NUMBER
			X	Surface impoundment managed to maintain at least 60 cm (2ft.) of freeboard	265.222	Н366
_ Х				Protective cover on earthen dikes, such as suitable vegetation, rock rip-rap or non-erodible material to minimize wind and water erosion	265.223	Н367
X				Waste analysis and/or trial tests conducted when hazardous wastes substantially different from wastes previously treated or stored, or when hazardous waste is chemically treated with a substantially different process than any previously used in that impoundment	265.225(a)	н368
_			X	Freeboard level inspected once each operating day	265.226(1)	H369
			X	Surface impoundment, including dikes and vegetation surrounding the dike, inspected once each week	265.226(2)	Н370
(				Placement of ignitable or reactive waste only with Department's approval	265.229	H371
Ļ,				Precautions taken for handling ignitable, reactive or incompatible material	265.230	H372
-		X		Closure and post-closure requirements complied with	265.228(a-c)	H373

-	STA	TUS		No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-	Compliance	
1	2		REQUIREMENT		CHAPTER CITATION	
_			X	Approved groundwater sampling and analysis plan developed and implemented	265.92(a)	
	-		X	Adequate protection for groundwater monitoring wells	265.92(d)	
		·x		Groundwater quality assessment and abatement outline on the premises	265.93(a)	
		X		Closure plan on the premises and up-to-date	265.112(a)	
		X		Post-closure plan on the premises and up-to-date	265.118(a)	
		X		Annual closure cost estimate on the premises and up-to-date	265.142(a)	
_		X		Annual post-closure cost estimate on the premises and up-to-date	265.144(a)	

Х	CLOSURE & POST CLOSURE LEACHITE	
1 1 1	PANDAGHENT REQUIREHENTS	265.310(0)(3)

X CLOSURE & POST CLOSURE AROUND WATER

MONITORING REQUIREHENTS. \_\_\_\_ 205.310(C)(Z)

- 3 -

1.153

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

 $\cdot \xi : \cdot \cdot \cdot$ 

	STA	TU:	5	REQUIREMENT	CHAPTER CITATION
1	2	3	4	- 1240111111111	
		7		Facility equipped with fire control, spill control, and decontamination equipment	265.32(3)
				Facility equipped with water at adequate volume and pressure to supply fire control equipment	265.32(4)
•				Facility communications or alarm systems, fire control, spill control, and decontamination equipment tested and maintained	265.33
		V		Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	265.35
			X	Contingency plan onsite and implemented ALSO 245.50	265.51(a)
		1		Contingency plan describes action taken by personnel in the event of an emergency	265.52(a)
				Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	265.52(c)
				Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	265.52(d)
		П		Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	265.52(e)
				Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	265.52(f)
				Emergency coordinator designated and on the premises or on call	265,55
				Facility accepting only PA manifests	265.71(a)
		$\prod$		Manifest properly completed and routed within time limits	265.71(b)(c)
		V		Manifest discrepancies resolved or reported within time limits	265.72(b)
			X	Written operating record maintained on the premises	265.73(a).
		X		Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	265.73(b)(1)
				Written operating record contains location and quantity of each hazardous waste	265.73(b)(2)
				Written operating record contains results of waste analyses and treatability tests	265.73(b)(3)
				Written operating record contains reports and details of all incidents	265.73(b)(4)
				Written operating record contains records and results of all inspections	265.73(b)(5)
		***************************************		Written operating record contains required monitoring, testing, and analytical data	265.73(b)(6)
			Written operating record contains closure and post-closure cost estimates	265.73(b)(7)	
1				All records retained on premises and available for inspection	265.74(a)
1		V		Quarterly reports submitted to DER	265.75(a)
1			X	Emissions, discharges, fires, explosions, and groundwater contamination reported as required	265.77(a)
7	一	V	<u> </u>	Groundwater monitoring wells located at approved sites	265.90(b)

ER-WAR-302: Rev. 11/83

### COMMONWEALTH OF PENNSYLVAMA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

•						
Site Name	BOYERTOWN	LHDFL-	ID Number	PAD 0486 03005	Date _	· · · · · · · · · · · · · · · · · · ·

### Hazardous Waste Inspection Report TSD Facilities - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS		;	REQUIREMENT	CHAPTER CITATION		
1	2	3	4	REQUIREMENT		
		X		Part A permit application submitted	265.1(b) 265.431(a)	
				Identification number	265.11	
				Wastes accepted at facility transported by haulers licensed by DER to transport hazardous waste	265.11(a)	
		1		Waste streams not covered by permit approved by DER before acceptance	265.13(a)	
		$\Pi$		Chemical and physical analysis repeated as required	265.13(a)(1-3)	
		П		All waste shipments inspected and analyzed when necessary	265.13(b)	
		П		Waste analysis plan on-site	<b>265.13(c)</b>	
		П		24 hr. surveillance at active portion	265.14(b)(1)	
		1		Artificial barrier around active portion	265.14(b)(2)	
		П		Proper signs posted at each entrance, minimum 4 inch lettering	265.14(c)	
				Facility inspection schedule on-site	265.15(b)(1)	
				Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	265.15(d)	
				Immediate remedial action taken where a hazard is imminent or has already occurred	265.15(d)	
7				Approved on the job or classroom personnel training program implemented	265.16	
				Records retained for each employee at facility of training, job title, and job description	265.16(f);(g)	
1		T	•	Ignitable or reactive wastes separated from source of ignition or reaction	265.17(a)	
				No smoking signs displayed where there are hazards from ignitable or reactive wastes	265.17(a)	
1				Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	265.17(b)	
1				Facility maintained/operated to minimize possibility of fire, explosion, or discharge of hazardous waste or hazardous constituents	265.31	
T				Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	265.32(1)	
T		V		Device for summoning outside emergency assistance available at scene of operations	265.32(2)	

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# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES BUREAU OF WASTE MANAGEMENT

	1 - 1	, HAZARDOUS WAS	TE INSPEC	TION REPORT	
3/1	7,3/18,3/19,3	HAZARDOUS WAS 3/20 TSD FACIL 3/24, 3/25, 4/3, 4/13, 4	LITIES - PAI	RT A 125 4/26	
3/2	1, 3/55 3/23	5/14, 31 03, 7/3, 4/13, 4	/17, 4/20/ T	Time finish	
Date	of Inspection 31	2, 3/4, 1913 time	Jrai r		
Nam	e of Inspector	CHARLIE FEE	<u>s</u>		
Com	pany, installation	name BOYERTOWN	LANDFIL		
Loca	tion300 }	TERKEL RD. CILB	EBIS VILLE	PA. 19525	
Cour	MONTES	HERY	_ Municipality	DOUCLAGS Tup.	
ideni	tification number	EPA ID PADO	148603005	· · · · · · · · · · · · · · · · · · ·	<del></del>
Nam	e of responsible o	fficial WARREN F	RLHE	•	
	Δ.	LUED / PRESIDE	UT		
Mail	ing Address	1205 POTTSTOWN	PIRE	CLEHMOORE PA.	19343
Acas	code and telepho	one number (CID)	450-53	00	·
Mam	e of person interv	iewedBYRON	WENC	ER	
		ASSISTANT			
		•			
	· .	ferent from above)			
Area	code and telepho	one number			
1.	Site characteriza	tion:			
	a. 🖾 Treatment -	surface impoundments	☐ chemical	<b>⊠</b> physical	図 biological
•	b. ⊠ Storage -		☐ tanks	Surface impoundments	waste piles
		☐ land treatment	□landfill		☐ thermal treatment
	d. 🗆 Use	reuse	recycle	□ reclaim ·	
2.	Does the facility	generate hazardous waste?	⊠ Yes □	No	
3.	Types of hazardo	ous waste produced by Hazard	dous Waste Nu	mber:	
•	F039 M	ULTI-SOURCE LE	ACHATE		
4.	Are hazardous w	rastes transported off-site by	the facility?	☐ Yes      Yes	

### COMMONWEALTH OF PENNSYLVANIA BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

#### **INSPECTION REPORT COMMENTS**

Date of Ins	spection_9 September 2004 Id	entification Number PAD04	3603005
Company/	/Facility/Site Name Boyertown Sanitary Disposal (B	SD)	
Waste Ma	hazardous waste TSD inspection was conducted on anagement Specialist, and Dennis Harney, Compliant reseident of BSD, was present during the inspection	nce Specialist with the Depart	
<u>Th</u>	he following observations were noted:		
1)	Both of the treated leachate lagoons and the raw leachate liners of these lagoons determined to be leaking		
2)	Neither the main flare, the temporary candle flares operating during the inspection. There was a modeleachate treatment plant.		
3)	The new gas destruction system has been test run.		
4)	BSD has not submitted to the Department quarter quarter of 2003.	y groundwater monitoring re	esults since the first
The fo	ollowing violations were noted:		
1)	Failure to report to the Department the quarterly g quarter of 2003 through the second quarter of 200 This is contrary to 25 Pa Code § 264a.97(2)(ii).	<u> </u>	40 CFR§ 264.98.
2)	By failing to repair the leachate lagoon liners and BSD has failed to control the escape of leachate an environment. This is contrary to 40 CFR §§ 265.1	nd hazardous waste decompo	
	mmary, two violations were noted during the inspection. A copy of this report w		ection were reviewed
notification of herein, or othe This imply immunit Sigr	s inspection report is notice of the findings of an inspection conduction observed during the inspection. Additional notification of its inspection is dentified as a result of review of laboratory analyses or E is report does not constitute an order or other appealable action of the ty from legal action for any violation noted herein.  Inature by the person interviewed does not necessarily imply concurrence thought the person interviewed does not necessarily imply concurrence.	tion of violations may be issued con- Department records.  Department. Nothing contained here	cerning either violations noted in shall be deemed to grant or
Person into	terviewed (signature) Wanen X. Frams	Pvs Date	9/9/04
Inspector (	(signature) Dull Hull	Date	9/9/04
	•		Page of

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

	1-No Violation Observed	2-Not-Applicable	3-Not-Determined	4-Non-Cor	npliance	
Site Haine	0370	ib Namber _/	700 78603003	Date		_
Site Name	RCAC	ID Number	10048603005	Date	0/0/04	

	STATUS			D-01110-1-1-1-1	CHAPTER	LINE
1	2	3	4	REQUIREMENT	CITATION	NUMBER
X				Run-on diverted away from the facility	265.302(a)(1)	H425
×				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
×				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X		-	Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
		×		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		×		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
٦			X	Closure and post-closure requirements complied with	265.310	H431
)	λ			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	×			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	λ			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid		H434
	X.			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2 3 4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		Closure plan on the premises and up-to-date	265a.1	265.112	H250
	$\times$	Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
	X	Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
	Х	Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.	
				Emergency coordinator designated and on the premises	264a.1	264.55	H232	
	X			or on call	265a.1	265.55	-	
	λ			Only Department approved manifest used, unless	264a.71		H233	
	_^			manifest not required by 40 CFR 262.20(e)	265a.71			
	X			Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234	
					265a.71	265.71(a)(b)	<u>'</u>	
				Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235	
	Х			limits	265a.1	265.72(b)		
	L			Written operating record maintained on the premises	264a.1	264.73(a)	H236	
	X				265a.1	265.73(a)		
				Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237	
	X			of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)		
	X		ľ	Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238	
	^	L.	_	each hazardous waste	265a.1	265.73(b)(2)		
				Written operating record contains results of waste	264a.1	264.73(b)(3)	H239	
	У			analyses and treatability tests	265a.1	265.73(b)(3)		
	λ			Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240	
	Ľ			incidents that required implementing the contingency plan	265a.1	265.73(b)(4)		
	ĺχ			Written operating record contains records and results of	264a.1	264.73(b)(5)	H241	
	_^			all inspections	265a.1	264.73(b)(5)		
	X			Written operating record contains required monitoring;	264a.1	264.73(b)(8)	H242	
				testing and analytical data	265a.1	265.73(b)(6)		
				Written operating record contains closure and post-closure	264a.1	264.73(8)	H243	
	χ			cost estimates	265a.1	265.73(8)		
				All records retained on premises and available for	264a.1	264.74	H244	
	×			inspection	265a.1	265.74		
	X			Biennial reports submitted on the Department's version of	264a.75	264.75	·H245	
	^			EPA Form 8700-13B	265a.75	265.75		
	X			Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246	
	L			contamination reported as required	265a.1	265.77(a)		
	X	L		Groundwater monitoring wells located at approved sites	265a.1	265.91	H247	
_			×	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248	
	×			Groundwater quality assessment outline on the premises	265a.1	265.93	H249	
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1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

3 1	1 2 3 4			REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
Ė			Ė	Ignitable or reactive wastes separated from source of	264a.1	264.17(a)	H216
	χ	ignition or reaction			265a.1	265.17(a)	·
				No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
	X			from ignitable or reactive wastes	265a.1	265.17(a)	
				Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
	X,			or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
				Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
	χ			explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	•
	X			Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
_				immediate emergency instruction to personnel	265a.1	265.32(b)	
3;				Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
	ķ	available at scene of operations 265a.1 2		265.32(b)			
				Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
È.	K			decontamination equipment	265a.1	265.32(c)	4
	l,			Facility equipped with water at adequate volume and	264a.1	264.32(d)	Ĥ223
	λ.	5,		pressure to supply fire control equipment	265a.1	265.32(d)	
	ا.			Facility communications or alarm systems, fire control,	264a.1	264.33	H224
	X	\$		spill control and decontamination equipment tested and maintained	265a.1	264.33	
				Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
	X			movement of personnel and equipment during emergencies	265a.1	265.35	
				Contingency plan onsite and implemented	264a.1	264.51	H226
L	У		L		265a.1	265.51	
				Contingency plan describes actin taken by personnel in	264a.1	264.52(a)	H227
	λ			the event of an emergency	265a.1	265.52(a)	
				Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
	λ			outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
				Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
	X			addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	,
			1	Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
	×			including location, physical description and capabilities to each item	265a.1	265.52(e)	
	X			Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
	1			possibility that evacuation could be necessary	265a.1	265.52(f)	<u>                                     </u>

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## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name <u>BSDC</u>	ID Number <u> </u>	9/9/04
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### Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
×				Identification Number	265a.11	264.11	H201
	λ			Wastes accepted at facility transported by haulers licensed	264a.11		H202
L	^			by DEP to transport hazardous waste	265a.11		
	V			Waste streams not covered by permit approved by DEP	264a.13		H203
	X			before acceptance	265a.13		
	λ			Chemical and physical analysis repeated as required	264a.13	264.13	H204
	^				265a.13	265.13	
	X			All waste shipments inspected and analyzed when	264a.13	264.13	H205
	^		Ľ	necessary	265a.13	265.13	
	×	<u> </u>		Waste analysis plan on-site	264a.1	264.13(b)	H206
	^				265a.13	265.13(b)	
	$\lambda$			24 hr. surveillance at active portion	264a.1	264.14(b)(1)	H207
	<u>``</u>				265a.1	265.14(b)(1)	
	×			Artificial barrier around active portion	264a.1	264.14(b)(2)	H208
•	Ĺ			A CONTRACT OF THE STATE OF	265a:1	265.14(b)(2)	
×			,	Proper signs posted at each entrance, minimum 4 inch	264a.1	264.14(c)	H209
<u>^</u>				lettering	265a.1	265.14(c)	
	X			Facility inspection schedule on-site	264a.1	264.15(a)(1)	H210
	^	<u>_</u> .	<u> </u>		265a.1	265.15(b)(1)	
	χ			Facility construction schedule submitted to Department for inspection and approval	264a.15		H211
	^	_	<u> </u>		265a.15		<u> </u>
	x			Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1	264.15(c)	H212
	_	<u> </u>		which reveal deterioration of manufactions.	265a.1	265.15(c)	
	χ			Immediate remedial action taken where a hazard is	264a.1	264.15(d)	H213
		<u> </u>		imminent or has already occurred	265a.1	265.15(d)	
	λ			Approved on the job or classroom personnel training	264a.1	264.16	H214
	Ĺ			program implemented	265a.1	265.16	
	X			Records retained for each employee at facility of training,	264a.1	264.16(d)	H215
			<u>L</u>	job title and job description	265a.1	265.16(d)	

Page	ot	

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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date	e of Inspection $9/9/04$ Tin	e start	Time finish	
	ne of Inspector <u>GERRY RADOMS</u>			
Con	npany, installation name <u>807ERTOW</u> A	1 SANITARY	DISTOSAC	co (BSOC)
	ation 300 MERKEC RO			
Cou	nty <u>MONTGOMERY</u>	Municipalit	y DOUGLASS	TWP
	tification number <u>PAO 048 CO 3 O</u> C			
Nan	ne of responsible official <u>WARREN</u>	FRAME		
Title	PRESIDENT.			
Mai	ing Address /205 /07/570	WN PIKE	BLENMORE	MA 19342
Area	a code and telephone number	21-1236		
Nan	ne of person interviewedWARREN	FRAME		
Mai	ing address (if different from above)			
Area	a code and telephone number			•
1.	Site Characterization: Treatment	Storage	Disposal	
Che	ck all that apply:			
	surface impoundments	☐ inc	cineration	
	chemical treatment	iners 🔲 Bl	F	
	physical treatment  waste	piles 🗌 re	cycle	1
M	biological treatment	inment bldg. 📈 lai	ndfill	
	Other Specify			
2.	Does the facility generate hazardous waste?	☐ Yes 🔀 No		•
3.	Types of hazardous waste produced by Haza	dous Waste Number:		
4.	Are hazardous wastes transported off-site by	the facility?	∕es ⊠No	

Page \_\_\_\_\_ of \_\_\_\_\_

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Company/Facility/Site GROWS Landfill

signed copies were at the WWTP and were not viewed during the inspection.

## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

#### Inspection Report Comments

Date of Inspection August 2, 2005 Identification Number PAD000429589

ensure that it obtains the signed return manifest for its shipment of hazardous waste within 30 days of shipment. The

7. The daily, weekly, and monthly inspection reports and operational logs for the treatment plant, roll-offs,

tanks, pad, safety equipment, etc. as well as the PPC Plan were reviewed.
No violations were noted during the inspection.
· ·
·
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.
Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Date 8-2-05
Inspector (signature) Kenn C Bauey Date 8/2/25

ER-WM-129: Rev. 7/95

## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date of Inspection August 2, 2005	Identification	Number	PAD000429589	<u>}</u>
Company/Facility/Site_GROWS_Landfill			_	
		,		
A manufaction matter (Cd. 1 1 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	' CDOTTICE	10111		_

A routine inspection of the hazardous waste activities occurring at GROWS Landfill located in Falls Township, Bucks County was conducted on August 2, 2005, by Mr. Kevin Bauer of the Department. Mr. Don Demkovitz and Mr. Doug Wood were present for the facility. The following observations were noted:

- 1. GROWS Landfill is a large quantity generator of hazardous waste, operates a wastewater treatment plant (WWTP) under PBR for the treatment of F039 leachate, and is operating under a RCRA post-closure permit for the old GROWS Landfill. The facility has a USEPA identification number of PAD000429589.
- 2. The old GROWS Landfill has a sprayed asphalt liner. Leachate from the old GROWS Landfill is gravity drained to the WWTP. The leachate (F039), segregated from other leachate generated at the landfill, enters a collection sump. On average, 4300 to 4800 gallons of leachate from the old GROWS is generated daily. Grit is periodically removed from the sump and placed into a grit-dewatering chamber. Leachate drained from this process is piped into the plant. The grit-dewatering chamber was properly labeled, dated, and covered with a tarp. The tarp on one end of the chamber is opened during sunny days to help dry the material. Within 90 days from placement of the grit into the chamber, the grit is loaded into a roll-off and disposed as a hazardous waste (F039) at Model City, NY.
- 3. The hazardous leachate combined with leachate from the landfill is then treated in the plant. Operations at the plant and the treatment process were reviewed and explained. The plant is limited to a 100,000 gpd average discharge and is now treating about 80,000 to 87,000 gpd of leachate. Filter cake from the treatment process is placed into a roll-off, labeled as hazardous waste, and placed onto a containment pad. Every 28 days, the filter cake is sampled. If the samples meet the delisting criteria, the filter cake is handled as a residual waste and disposed at GROWS. If the sample results are not back within 90 days or if it fails the delisting criteria, the material is handled as a hazardous waste and disposed at Model City. It has been at least 10 12 years since this has happened.
  - 4. Waste Management should remove weeds from and make repairs as needed to the roll-off containment pad.
- 5. Waste Management should look into recoating the ammonia stripping towers and the effluent storage tank. Rust is forming on these tanks.
- 6. The facility utilizes three Safety Kleen parts washers (petroleum naphtha) at the WWTP and the truck maintenance facility. Manifests for the disposal of the naphtha and the grit were reviewed. Waste Management should

This inspection report is notice of the findings of an inspection conducted by a representative of the
Department. This report is formal notification of any violations observed during the inspection.
Additional notification of violations may be issued concerning either violations noted herein, or other
violations identified as a result of review of laboratory analyses or Department records.
This report does not constitute an order or other appealable action of the Department. Nothing
contained herein shall be deemed to grant or imply immunity from legal action for any violation noted

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) on Dansout	Date 8-2-05
Inspector (signature) Kon & Bauer	Date 8/2/05
·	Page 16 of 11

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X	•			Closure plan on the premises and up-to-date	265a.1	265.112	H250
X				Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
Х				Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
Х				Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X				Emergency coordinator designated and on the premises or on call	264a.1 265a.1	264.55 265.55	H232
х			<u> </u>	Only Department approved manifest used, unless	264a.71	205.55	H233
				manifest not required by 40 CFR 262.20(e)	265a.71	,	
X				Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234
					265a.71	265.71(a)(b)	
X				Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235
				limits	265a.1	265.72(b)	
X				Written operating record maintained on the premises	264a.1	264.73(a)	H236
					265a.1	265.73(a)	
x				Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
				of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	
x				Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
				each hazardous waste	265a.1	265.73(b)(2)	
x				Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
			•	analyses and treatability tests	265a.1	265.73(b)(3)	
X				Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
_			_	incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	<u> </u>
Χ				Written operating record contains records and results of	264a.1	264.73(b)(5)	H241
				all inspections	265a.1	264.73(b)(5)	_
X.				Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
_	_			testing and analytical data	265a.1	265.73(b)(6)	
X		i		Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
_				cost estimates	265a.1	265.73(8)	
Х		•	. ]	All records retained on premises and available for	264a.1	264.74	H244
	$\Box$			inspection	265a.1	265.74	
X				Biennial reports submitted on the Department's version of	264a.75	264.75	H245
$\perp$			_	EPA Form 8700-13B	265a.75	265:75	
хļ				Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246
$\downarrow$	_	$\perp$		contamination reported as required	265a.1	265.77(a)	
x				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
X		_ [		Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
x			1	Groundwater quality assessment outline on the premises	265a.1	265.93	H249

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS					PA CIT.	FED CIT.	LINE
1	2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
X				Ignitable or reactive wastes separated from source of ignition or reaction	264a.1	264.17(a)	H216
			-		265a.1	265.17(a)	
X				No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
				from ignitable or reactive wastes	265a.1	265.17(a)	
X				Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
				or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
X				Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
				explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	
X				Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
				immediate emergency instruction to personnel	265a.1	265.32(b)	
Х				Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
				available at scene of operations	265a.1	265.32(b)	
X				Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
				decontamination equipment	265a.1	265.32(c)	
X				Facility equipped with water at adequate volume and	264a.1	264.32(d)	H223
			pressure to supply fire control equipment		265a.1	265.32(d)	
$\mathbf{x}$			Facility communications or alarm systems, fire control,		264a.1	264.33	H224
				spill control and decontamination equipment tested and maintained	265a.1	264.33	
x				Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
				movement of personnel and equipment during emergencies	265a.1	265.35	
Х				Contingency plan onsite and implemented	264a.1	264.51	H226
					265a.1	265.51	
Х				Contingency plan describes actin taken by personnel in	264a.1	264.52(a)	H227
				the event of an emergency	265a.1	265.52(a)	
Χ				Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
				outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
Х				Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
				addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	
Х			_	Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
				including location, physical description and capabilities to each item	265a.1	265.52(e)	
Х				Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
				possibility that evacuation could be necessary	265a.1	265.52(f)	

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

	10D I ACILITIES - I AIX I D	
•		•
Site Name GROWS Landfill	ID Number PAD000429589	Date 8/2/2005

## Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
Х			Ŀ	Identification Number	265a.11	264.11	H201
X				Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
X				Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
X			,	Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
X				All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
X				Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
X				24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X			,	Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
Х				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
х				Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
X				Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15	200.10(8)(1)	H211
X				Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
X				Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
X				Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
X				Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215



### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Dat	e of Inspection August 2, 2005	Time start <u>11:00</u>	<u> </u>	Time finish			
Nar	Name of Inspector Kevin Bauer						
Cor	npany, installation name <u>GROWS</u>						
Loc	ation 1000 New Ford Mill Road			·			
Col	inty Bucks	M	unicipality <u>Falls</u>	Township			
ide	ntification number PAD000429589	)					
Nar	Name of responsible official Don Demkovitz						
Title	Manager of Environmental Prote	ection					
Mai	ling Address 1121 Bordentown Ro	Morrisville, PA 19067					
Are	a code and telephone number 21	5-428-4377					
Nar	ne of person interviewed <u>Don De</u>	<u>mkovitz , Doug Wood – T</u>	reatment Plant C	Operator			
Mai	ling address (if different from at	ove)	<del></del>				
Are	a code and telephone number						
1.	Site Characterization:	Treatment –	Storage-	Disposal –			
			roll-offs	post- closure			
Ch	eck all that apply:						
П	surface impoundments	⊠ tanks	incineration	on			
$\boxtimes$	chemical treatment		☐ BIF				
$\boxtimes$	physical treatment	waste piles	recycle	·			
$\boxtimes$	biological treatment	containment bldg.					
	Other	Specify		·			
				•			
2.	Does the facility generate hazard	lous waste? ⊠ Yes	□No	•			
3.	Types of hazardous waste produ	ced by Hazardous Waste	Number:	,			
	F039, D001, D018, D039	i		•			
			1				
4.	Are hazardous wastes transporte	ed off-site by the facility?	☐ Yes	⊠ No			

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nar	те <u>С</u>	GRC	NWS Landfill ID Number PAD000429589	Date <u>8/2/</u>	2005	
•			1 - N	No Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Com	ipliance	,
ST	ATU	S				•	
1_	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	<u> </u>		<u> </u>	LQG TANKS (Subchapter J)			
X				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
×				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
×				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H04
$\boxtimes$				Tanks labeled to accurately identify contents	265a.194		H044
×				Required inspections completed and documented in operating log	265a.195	265.195	H045
Ø				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
$\boxtimes$				Special requirements for ignitable and reactive wastes 265a.1 265.198			
				Special small quantity generator requirements	265a.1	265.201	H048
	L.				,		
	<u> </u>			SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H05?
	X			If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
	Ø			Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
	$\boxtimes$			Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
$\square$	$\boxtimes$			Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	$\boxtimes$			Incompatible waste requirements met	265a.1	265.201(f)	H059

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nan	ne <u>G</u>	<u>ROV</u>	VS Landfill ID Number PAD000429589	Date <u>8/2/2</u>	2005	-	
		1	- No	Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Con	npliance		
STA	ATUS 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.	
				CONTAINERS (Subchapter I)				
$\boxtimes$				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025	
$\boxtimes$				Containers of hazardous waste in good condition	265a.1	265.171	H026	
				Containers and stored waste compatible	265a.1	265.172	H027	
اجما -				Containers kept closed except during addition or removal of wastes	· · · · · · · · · · · · · · · · · · ·			
$\boxtimes$				Containers managed to prevent leaks	265a.1	265.173(b)	H029	
				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030	
$\boxtimes$				Container storage areas inspected at least weekly	265a.1	265.174	H031	
$\boxtimes$				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032	
				Proper containment and collection systems in place	265a.179		H033	
$\boxtimes$				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034	
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035	
$\boxtimes$				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036	
				Containers labeled accurately identify contents	SWMA 6018.403(b)		H037	

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Siti	e mai	ile G	KUN	NO Landini ID Number PAD000429509	Date <u>6/2</u>	/2005	-	
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance								
ST	ATUS	S					4	
1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.	
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001	
$\boxtimes$				Identification Number	262a.10	262.12	H002	
X				Authorized transporters only	262a.10	262.12(c)	H003	
$\boxtimes$				Subsequent notification requirements met	262a.12(b)		H004	
$\boxtimes$				Proper manifest used	262a.10	262.21	H005	
$\boxtimes$				Manifests filled out correctly and completely	262a.20	,	H006	
$\boxtimes$				Manifests signed and routed properly	262a.23(a)	262.23	H007	
$\boxtimes$				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008	
	$\boxtimes$			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009	
	$\boxtimes$			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010	
$\boxtimes$				Satellite accumulation requirements complied with				
$\boxtimes$				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012	
				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013	
$\boxtimes$				Specified records retained for three years	262a.10	262.40(c)	H014	
$\boxtimes$				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015	
$\boxtimes$				Exception reporting procedures followed	262a.42	262.42	H016	
$\boxtimes$				Spill reporting procedures followed	262a.10	262.34(d)	H017	
$\boxtimes$				PPC plan developed and implemented	262a.10	262.34(a)	H018	
	$\boxtimes$			Special requirements followed for international shipments	262a:10	262.50	H019	
						262.60		
	<b>П</b> .			Source reduction strategy prepared and available (LQG only)	Source reduction strategy prepared and available (LQG 262a.100 H0			
	$\boxtimes$			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021	
					-			
							1	
	$\overline{}$			· · · · · · · · · · · · · · · · · · ·		<del></del>		

2500-FM-LRWM0276 Rev. 5/99



# COMMONWEALTH OF PENNSYLVANIA

Inspection Date	8/2/2005
Time Start	11:00

DEPARTMENT OF ENVIRONMEN	ITAL PROTECTION
BUREAU OF LAND RECYCLING AND	WASTE MANAGEMENT Time Start 11:00
	Time Finish
HAZARDOUS WASTE INSP	PECTION REPORT HWOEN - 1469968
GENERATOR	S Q GENERATOR HWPBR- 1469969
	I.D. Number PAD000429589
VS Landfill	I.D. Number PAD000429589

$\bowtie$	GENERATOR	SQGENERATOR HWYBK 1467 HW TSOduqual -			
Company name GROWS	Landfill				
Site Address 1000 New F	ord Mill Road Morrisville, PA 19067				
County Bucks	Municipality Falls Tov	vnship Zip 19067			
Name of Inspector Kevin	Bauer				
Name & Title of Responsi	ble Official <u>Don Demkovitz - Manager</u>	of Environmental Protection			
Person Interviewed Don D	Demkovitz, Doug Wood	Telephone ( 215 ) 428-4377			
Mailing Address (if differe	nt from above) 1121 Bordentown Rd.	Morrisville, PA 19067			
Amount of Hazardous Wa	ste Generated per Month: >2200	Pounds Kgs			
1. Site Characterization	1:				
STORAGE: 🛛 Con	ntainer 🛛 Tanks 🔲 Containment	Bldg. Drip Pad Other			
PBR: ⊠ Ne	utralization/WWTP	Other			
GENERATOR TREAT	「MENT ☐ Containers ☐ Tan	ks Containment Bldg. Drip Pad			
2. Universal Waste:	Large Quantity Handler	all Quantity Handler			
Universal Waste	Туреѕ				
3. Hazardous Waste Tr	ansporters:				
Transporter Name	Horwith Trucks	License Number PA-AH0176			
Transporter Name	Safety Kler	License Number PA-AH0172			
Transporter Name		License Number			
4. Types of hazardous	w on fa	cility (location & type).			
Waste Code	(A)	Destination Facility			
F039	ıd - grit	CWM Chem Services			
		Model City, NY			
D001, 19, 39	petroleum naphtha .	Safety Kleen FairlessHills			
F039	leachate from old GROWS La	andfill treated on-site			

3ER-WM-129: Rev. 12/93

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

Date of inspection
Company/Facility/Site Name: Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")
Sampling Event
On this day the weather was partly sunny and pleasant, approx. 75° F.
The sampling event began at approximately 8am, and lasted until approx. 1:30pm.
The following wells were sampled:
SMW-1, AMW-1, MW-5, MW-6, Mw-7, MW-8, MW-9, MW-10, MW-11, and MW-12.
Γhe sample bottles were labeled and given the proper fixatives prior to sampling. The following parameters were sampled:
a) Volatile organic compounds (VOC) b) Total organic halides (TOX) c) Inorganics d) Total organic carbon (TOC) e) Phenols f) Ammonia g) Total Metals h) Dissolved Metals
After sampling, each group of bottles were given a legal seal, and packed with ice in a cooler.
After returning to the DEP building, in Norristown PA, the bottles were shipped to the PA DEP labs, located in Harrisburg, PA.
The sampling event was conducted on Tuesday (5-17-05), and Thursday (5-19-2005)
Conclusion
It is recommended that BSD perform all future groundwater sampling events in order to return to compliance with 40 CFR 264.99(a).
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is forma notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Date
Inspector (signature) $\int \frac{du}{dt} \int \frac{dt}{dt} \int dt$

### INSPECTION REPORT COMMENTS

Date of inspection05/1	7/2005	Identifi	cation Number:	PAD 04860300	<b>5</b>
Company/Facility/Site Nan	ne: <u>Boyertowr</u>	Landfill (a	ka Boyertown Sa	nitary Disposal '	"BSD")
				· · · · · · · · · · · · · · · · · · ·	<del></del>
Introduction			•		
On this date, The Department performed this split sampling to perform this sampling even	g event along with "	Protection p Tetra Tech,	erformed a ground Inc." who are the	lwater-sampling e consultants contr	event. The Department acted by The Department
Background		•		•	
Boyertown Landfill is a clos hazardous wastes from industry groundwater contamination	stry. Groundwater s	peen determi ampling is ro	ned to be hazardo outinely performed	us because it had dat this facility to	in the past accepted detect ay signs of
Because of its hazardous des (CME) sampling at this land the wells at this landfill. Th	fill. The owner of the	ment require	es BSD to conduct Warren Frame, has	t annual complian s failed to perform	ce-monitoring-evaluation this annual sampling of
40 CFR 264.99(a) "Owner	or operator must mo	nitor the gro	undwater"		
Because Mr. Frame failed to CME sampling of this landfi	conduct this require	ed sampling,	the Department c	ontracted Tetra-T	ech, inc. to assist with the
At today's sampling event th	ne following personn	el were pres	ent:		
Boyertown Landfill	PA DEP		Tetra Tech		•
Warren Frame	Jennifer Wilson Andrew Haneiko Charlie Fees		Todd Riger Derrick Pinkha	ım	
			-		
herein, or other violations identified  This report does not consimply immunity from legal action for	ved during the inspection as a result of review of labition atitute an order or other a any violation noted here interviewed does not nece	on. Additional aboratory analys ppealable actions.  Sessarily imply of the control of the contr	notification of violation es or Department reconn of the Department.	ns may be issued colords.  Nothing contained he	partment. This report is formal ncerning either violations noted rein shall be deemed to grant or , but does acknowledge that the
Person interviewed (signal	wife)			Date	
Inspector (signature)	Herlie J. De			Date	5/17/2005
	<i>J</i>	<u>.</u>			Page of

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	Ī	v		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		1		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Emergency coordinator designated and on the premises	264a.1	264.55	H232
ŀ	X			or on call	265a.1	265.55	,
	•			Only Department approved manifest used, unless	264a.71		H233
	X			manifest not required by 40 CFR 262.20(e)	265a.71		
- 1	<b>'</b>			Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234
_	X				265a.71	265.71(a)(b)	·
	7]			Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235
,	X			limits	265a.1	265.72(b)	
	1			Written operating record maintained on the premises	264a.1	264.73(a)	H236
		X			265a.1	265.73(a)	
		'	k 	Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
_	X			of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	
	′			Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
	X			each hazardous waste	265a.1	265.73(b)(2)	
				Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
		X		analyses and treatability tests	265a.1	265.73(b)(3)	<u> </u>
		'`		Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
	X			incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	
			Written operating record contains records and result		264a.1	264.73(b)(5)	H241
	X			all inspections	265a.1	264.73(b)(5)	
		ŀ		Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
,	X		L.	testing and analytical data	265a.1	265.73(b)(6)	
				Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
	X		Ŀ	cost estimates	265a.1	265.73(8)	
	•			All records retained on premises and available for	264a.1	264.74	H244
	X		ļ	inspection	265a.1	265.74	-
				Biennial reports submitted on the Department's version of	264a.75	264.75	H245
	X		L	EPA Form 8700-13B	265a.75	265.75	<u> </u>
				Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246
	X	L		contamination reported as required	265a.1	265.77(a)	
X	Ĺ			Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
_			X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249
_	_	_					

1 - No Violation Observed

2 - Not Applicable 3 - Not Determined

4 - Non Compliance

1	7AT 2	3		REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			Ì	Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a) 265.17(a)	H216
	X	-		No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
	V			from ignitable or reactive wastes	265a.1	265.17(a)	
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	264a.1 265a.1	264.17(b) 265.17(b)	H218
	Λ χ			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
	χ			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
×	/3			Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
V				Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
				Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
^		X		Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
X				Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
		>		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
		X		Contingency plan describes actin taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
		X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
		X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
		X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
		X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name Boxentown Land Fill ID Number PAD 048603005 Date May 17'2005

## Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

5 I 1	STATUS 1 2 3 4			REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X	Ī			Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste.	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
		X		Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X	<i>(</i> )		All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X		in the state of th	24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
X	/-			Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
X				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
Δ		X		Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	Y	^		Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
	^	X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		X		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	Х			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215

eFACTC = 1466682 2500-FM-LRWM0302 Rev. 5/99





# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection May 17 7005 Time start_	Time finish
	en Haneiko Jennifon Wilson
	ind fill
	intaville, PA 19525
County Montgomery	Municipality Day Alack Tire
1 01/2	Municipality Douglass Twp.
Linguis de Maria (1988), 1980 (1980), 1980 (1980), 1980 (1980), 1980 (1980), 1980 (1980), 1980 (1980), 1980 (1	
Name of responsible official Warnen Fra	
Title Owner	
Mailing Address	
Area code and telephone number	
Name of person interviewed	
Mailing address (if different from above)	
Area code and telephone number	
1. Site Characterization: Treatment	☐ Storage ☐ Disposal
	, ,
Check all that apply:	The transfer of the control of the c
surface impoundments	☐ incineration
☐ chemical treatment ☐ containers	□ BIF
physical treatment	☐ recycle
<ul> <li>□ biological treatment</li> <li>□ Other</li> </ul>	, 🔀 landfill
□ Other Polyman	
(73)	
2. Does the facility general	⊠ No
3. Types of hazardous waste produced by mazardous	te Number:
A Are hazardous wastes transported off site by the facility	2 □ Ves ☑ No



### U.S. Environmental Protection Agency Resource Conservation and Recovery Act (RCRAInfo)

ĞÜ Recent Additions I Contact Us I Print Version EPA Home > Envirofacts > RCRAInfo > Query Results





Consolidated facility information (from multiple EPA systems) was searched to select facilities

Handler ID: Beginning With: pad048603005

Results are based on data extracted on JUL-10-2005

Note: Click on the underlined CORPORATE LINK value for links to that company's environmental web pages. Click on the underlined MAPPING INFO value to obtain mapping information for the facility.

Go To Bottom Of The Page

HANDLER NAME: BOYERTOWN SANITARY DISPOS HANDLER ID:

PAD048603005

STREET:

300 MERKEL RD **GILBERTSVILLE** 

**FACILITY INFORMATION: View Facility Information CORPORATE LINK:** 

No

CITY: STATE:

COUNTY:

MONTGOMERY

ZIP CODE:

PA 19525

MAPPING INFO:

MAP

**EPA REGION:** 

CONTACT INFORMATION

NAME	STREET	CITY	STATE	ZIP CODE	PHONE	TYPE OF CONTACT
MICHAEL MILLER	300 MERKEL RD	GILBERTSVILLE	PA	19525	2153677524	Public

#### HANDLER / FACILITY CLASSIFICATION

HANDLER TYPE	LAND DISPOSAL	INCINERATOR	BOILER AND OR INDUSTRIAL FURNACE	STORAGE	TREATMENT
Full Enforcement	Y				Y
Permit Progress	Y				Y
Permit Workload					Υ
Post-Closure Workload	Y				

HANDLER TYPE
TSDFs Potentially Subject to Corrective Action Under Section 3004 (u)/(v)
Subject to CA
CA Workload

Thunsporter

3ER-WM-129: Rev. 12/93

Date of inspection

05/17/2005

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

Identification Number: PAD 048603005

Company/Facility/Site Name:	Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD")
Sampling Event	
On this day the weather was partly	sunny and pleasant, approx. 75° F.
:	kimately 8am, and lasted until approx. 1:30pm.
The following wells were sampled:	
SMW-1, AMW-1, MW-5, MW-6, M	Mw-7, MW-8, MW-9, MW-10, MW-11, and MW-12.
	d given the proper fixatives prior to sampling. The following parameters were
<ul> <li>a) Volatile organic compounds (VC</li> <li>b) Total organic halides (TOX)</li> <li>c) Inorganics</li> <li>d) Total organic carbon (TOC)</li> </ul>	e) Phenols f) Ammonia g) Total Metals h) Dissolved Metals
After sampling, each group of bottle	es were given a legal seal, and packed with ice in a cooler.
After returning to the DEP building Harrisburg, PA.	in Norristown PA, the bottles were shipped to the PA DEP labs, located in
The sampling event was conducted	on Tuesday (5-17-05), and Thursday (5-19-2005)
Conclusion	
It is recommended that BSD perform 40 CFR 264.99(a).	all future groundwater sampling events in order to return to compliance with
herein, or other violations identified as a resu This report does not constitute an imply immunity from legal action for any viola	ed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the
Person interviewed (signature)	mayed 7-25-05 Date
Inspector (signature)	arlei / Les Date 5/17/2005
•	Page of

### INSPECTION REPORT COMMENTS

Date of inspection05/17	7/2005	Identification Number:	PAD 04860300	5
Company/Facility/Site Name	e: Boyertown La	ndfill (aka Boyertown Sa	nitary Disposal	"BSD")
Introduction				
On this date, The Department performed this split sampling to perform this sampling even	event along with "Tel	tection performed a ground tra Tech, Inc." who are the	lwater-sampling e consultants contr	event. The Department acted by The Department
Background			,	
Boyertown Landfill is a close hazardous wastes from indust groundwater contamination s	ry. Groundwater samp	a determined to be hazardou bling is routinely performed	us because it had I at this facility to	in the past accepted detect ay signs of
Because of its hazardous desi (CME) sampling at this landf the wells at this landfill. This	ill. The owner of this l	nt requires BSD to conduct landfill, Warren Frame, has	annual complian failed to perform	ce-monitoring-evaluation n this annual sampling of
40 CFR 264.99(a) "Owner of	or operator must monitor	or the groundwater"		
Because Mr. Frame failed to CME sampling of this landfil	conduct this required s	ampling, the Department co	ontracted Tetra-T	ech, inc. to assist with the
			· . ,	
At today's sampling event the	e following personnel v	vere present:		
Boyertown Landfill	PA DEP	Tetra Tech		
Warren Frame	Jennifer Wilson Andrew Haneiko Charlie Fees	Todd Riger Derrick Pinkha	m	
herein, or other violations identified a  This report does not const imply immunity from legal action for a	red during the inspection. It is a result of review of labora itute an order or other appearany violation noted herein. Interviewed does not necessal a copy was left with the pers	atory analyses or Department reco alable action of the Department.	s may be issued co ords. Nothing contained he	ncerning either violations noted rein shall be deemed to grant or

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		X		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		7		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1 2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
			Emergency coordinator designated and on the premises	264a.1	264.55	H232
X			or on call	265a.1	265.55	
<b></b>			Only Department approved manifest used, unless	264a.71		H233
K			manifest not required by 40 CFR 262.20(e)	265a.71		
7			Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234
X				265a.71	265.71(a)(b)	<u>'</u>
7/*	,		Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235
X			limits	265a.1	265.72(b)	
7			Written operating record maintained on the premises	264a.1	264.73(a)	H236
	٧		,	265a.1	265.73(a)	
			Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
X			of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	
			Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
V			each hazardous waste	265a.1	265.73(b)(2)	
7			Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
	Y	,	analyses and treatability tests	265a.1	265.73(b)(3)	
	-		Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
X			incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	
<b>—</b>			Written operating record contains records and results of	264a.1	264.73(b)(5)	H241
X			all inspections	265a.1	264.73(b)(5)	<u> </u>
1			Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
X			testing and analytical data	265a.1	265.73(b)(6)	·
	Γ		Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
l <sub>V</sub>			cost estimates	265a.1	265.73(8)	
7			All records retained on premises and available for	264a.1	264.74	H244
V			inspection	265a.1	265.74	
7	1		Biennial reports submitted on the Department's version of	264a.75	264.75	H245
¥			EPA Form 8700-13B	265a.75	265.75	
1	1	Γ	Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246
X			contamination reported as required	265a.1	265.77(a)	
V,		Γ	Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
	X	Γ,	Groundwater quality assessment outline on the premises	265a.1	265.93	H249

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				Ignitable or reactive wastes separated from source of	264a.1	264.17(a)	H216
_	X		<u> </u>	ignition or reaction	265a.1	265.17(a)	
				No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
	X			from ignitable or reactive wastes	265a.1	265.17(a)	
				Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
	X			or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
	ľ			Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
	X		_	explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	
				Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
	Х			immediate emergency instruction to personnel	265a.1	265.32(b)	
				Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
X				available at scene of operations	265a.1	265.32(b)	<u> </u>
				Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
X				decontamination equipment	265a.1	265.32(c)	
	i	٠		Facility equipped with water at adequate volume and	264a.1	264.32(d)	H223
X	Ц			pressure to supply fire control equipment	265a.1	265.32(d)	
•			l	Facility communications or alarm systems, fire control,	264a.1	264.33	H224
		X	L	spill control and decontamination equipment tested and maintained	265a.1	264.33	
4				Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
X			L	movement of personnel and equipment during emergencies	265a.1	265.35	
				Contingency plan onsite and implemented	264a.1	264.51	H226
		X			265a.1	265.51	
				Contingency plan describes actin taken by personnel in	264a.1	264.52(a)	H227
		X		the event of an emergency	265a.1	265.52(a)	
				Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
		χ		outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
				Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
	_	χ		addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	
				Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
		X		including location, physical description and capabilities to each item	265a.1	265.52(e)	
				Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
		X		possibility that evacuation could be necessary	265a.1	265.52(f)	

### HAZARDOUS WASTE INSPECTION REPORT **TSD FACILITIES - PART B**

ID Number PAD 048 603 005 Date May 17 2005

### **Hazardous Waste Inspection Report TSD Facilities - Part B**

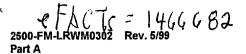
1 - No Violation Observed

2 - Not Applicable

3 - Not Determined 4 - Non Compliance

`T	Δ	TI	IS.	

1	1 2 3 4		4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
				Wastes accepted at facility transported by haulers licensed	264a.11		H202
	ΙX			by DEP to transport hazardous waste.	265a.11		<u>.</u>
	*			Waste streams not covered by permit approved by DEP	264a.13	-	H203
}	X			before acceptance	265a.13		<u> </u>
	7.5			Chemical and physical analysis repeated as required	264a.13	264.13	H204
		χ			265a.13	265.13	
				All waste shipments inspected and analyzed when	264a.13	264.13	H205
	χ			necessary	265a.13	265.13	
				Waste analysis plan on-site	264a.1	264.13(b)	H206
	X				265a.13	265.13(b)	-
				24 hr. surveillance at active portion	264a.1	264.14(b)(1)	H207
	X				265a.1	265.14(b)(1)	
				Artificial barrier around active portion	264a.1	264.14(b)(2)	H208
X			ļ <i>'</i>		265a.1	265.14(b)(2)	
				Proper signs posted at each entrance, minimum 4 inch	264a.1	264.14(c)	H209
X				lettering	265a.1	265.14(c)	i
				Facility inspection schedule on-site	264a.1	264.15(a)(1)	H210
		X	ļ		265a.1	265.15(b)(1)	
				Facility construction schedule submitted to Department for	264a.15	· · ·	H211
	χ			inspection and approval	265a.15		
				Maintenance schedule onsite for equipment or structures	264a.1	264.15(c)	H212
		X		which reveal deterioration or malfunction	265a.1	265.15(c)	
				Immediate remedial action taken where a hazard is	264a.1	264.15(d)	H213
		X		imminent or has already occurred	265a.1	265.15(d)	
				Approved on the job or classroom personnel training	264a.1	264.16	H214
	X			program implemented	265a.1	265.16	1
			Π	Records retained for each employee at facility of training,	264a.1	264.16(d)	H215
	X	'n		job title and job description	265a.1	265.16(d)	



Field



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection May	17 7005 Time start Time finish
Name of Inspector Cha	hles Fees, Andrew Hanerko
Company, installation name	Boxentown Landfill
Location 300 Men	
County Montgomes	
Identification number	AD 048603005
Name of responsible official _	Warnen Frame
Title Owhth	
Mailing Address	205 Putts town P.Ke, Cles mare PA 19343
Area code and telephone nun	
Name of person interviewed	
Mailing address (if different	from above)
Area code and telephone nun	nber
1. Site Characterization:	Treatment Storage Disposal
Check all that apply:	
surface impoundments	☐ tanks ☐ incineration
chemical treatment	☐ containers ☐ BIF
physical treatment	☐ waste piles ☐ recycle
biological treatment	☐ containment bldg.   I landfill
Other	Specify
Does the facility generate	hazardous waste?   Yes  No
3. Types of hazardous waste	e produced by Hazardous Waste Number:
4. Are hazardous wastes tra	nsported off-site by the facility?

ER-WM-129: Rev. 10/96

#### COMMONWEALTH OF PENNSYLVANIA BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS
Date of Inspection 9 September 2004 Identification Number PAD048603005
Company/Facility/Site Name Boyertown Sanitary Disposal (BSD)
A hazardous waste TSD inspection was conducted on Thursday September 9, 2004 by Gerry Radomski Waste Management Specialist, and Dennis Harney, Compliance Specialist with the Department. Mr. Warren Frame, Preseident of BSD, was present during the inspection.
The following observations were noted:
1) Both of the treated leachate lagoons and the raw leachate lagoon had the 2 feet of required freeboard.  The liners of these lagoons determined to be leaking by BSD have not been repaired.
2) Neither the main flare, the temporary candle flares nor the newly installed flare system were operating during the inspection. There was a moderate landfill gas odor noted in the area of the leachate treatment plant.
3) The new gas destruction system has been test run.
4) BSD has not submitted to the Department quarterly groundwater monitoring results since the first quarter of 2003.
The following violations were noted:
1) Failure to report to the Department the quarterly groundwater monitoring results for the second quarter of 2003 through the second quarter of 2004 for the parameters listed in 40 CFR§ 264.98. This is contrary to 25 Pa Code § 264a.97(2)(ii).
2) By failing to repair the leachate lagoon liners and by failing to collect and flare gas from the landfill, BSD has failed to control the escape of leachate and hazardous waste decomposition products to the environment. This is contrary to 40 CFR §§ 265.111.
In summary, two violations were noted during the inspection. The results of the inspection were reviewed with Mr. Frame during the inspection. A copy of this report was retained by the facility.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted nerein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant of may immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Wanen X. Frame Pres. Date 9/9/04
nspector (signature) Date 9/9/04
Page of

1-No Violation Observed

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

# HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

Site Name	BSOC	·	ID Number	FAD048603005	_ Date	2/9/0	74	
b.		,				7		
				,				

2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS					1,	
1	31A   2	3	4	REQUIREMENT	CHAPTER CITATION	LINE NUMBER
×				Run-on diverted away from the facility	265.302(a)(1)	H425
<u>~</u>				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
<				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
,		×		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		×		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
			X	Closure and post-closure requirements complied with	265.310	H431
	X			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	×			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	×			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4 REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		ኦ	Closure plan on the premises and up-to-date	265a.1	265.112	H250
		$\propto$	Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		λ	Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		×	Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1 2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	l		Emergency coordinator designated and on the premises	264a.1	264.55	H232
×			or on call	265a.1	265.55	
\		,	Only Department approved manifest used, unless	264a.71		H233
	<u> </u>		manifest not required by 40 CFR 262.20(e)	265a.71		<u>.</u>
ړ			Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234
	<u> </u>	<u> </u>		265a.71	265.71(a)(b)	
	ļ .		Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235
<u> </u>			limits	265a.1	265.72(b)	<u> </u>
×		:	Written operating record maintained on the premises	264a.1	264.73(a)	H236
^				265a.1	265.73(a)	<u> </u>
			Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
X			of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	
		:	Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
X			each hazardous waste	265a.1	265.73(b)(2)	
			Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
, <u>x</u>			analyses and treatability tests	265a.1	265.73(b)(3)	
lλ			Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
			incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	
$ \cdot _{X}$			Written operating record contains records and results of	264a.1	264.73(b)(5)	H241
			all inspections	-265a.1	264.73(b)(5)	
ķ			Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
	L		testing and analytical data	265a.1	265.73(b)(6)	
χ		}	Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
^	L		cost estimates	265a.1	265.73(8)	<del>                _       _</del>
×			All records retained on premises and available for	264a.1	264.74	H244
^	Ŀ	<u> </u>	inspection	265a.1	265.74	<u> </u>
x			Biennial reports submitted on the Department's version of	264a.75	264.75	H245
		<u> </u>	EPA Form 8700-13B	265a.75	265.75	
X			Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246
		Ŀ	contamination reported as required	265a.1	265.77(a)	-
X	ļ		Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		×	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
×			Groundwater quality assessment outline on the premises	265a.1	265.93	H249

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1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

314		•		PA CIT.	FED CIT.	LINE
1 2	3	4	REQUIREMENT	25 PA Code	40 CFR	NO.
			Ignitable or reactive wastes separated from source of	264a.1	264.17(a)	H216
×	1	ignition or reaction		265a.1	265.17(a)	
4			No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
1	X		from ignitable or reactive wastes	265a.1	265.17(a)	
		İ	Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
X		-	or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
		İ	Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
Х		ļ	explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	
X			Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
	_	L	immediate emergency instruction to personnel	265a.1	265.32(b)	
$ \mathbf{x} $		ľ	Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
^		_	available at scene of operations	265a.1	265.32(b)	
	1		Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
<u> </u>	<u> </u>		decontamination equipment	265a.1	265.32(c)	
	X		Facility equipped with water at adequate volume and	264a.1	264.32(d)	H223
		pressure to supply fire control equipment	265a.1	265.32(d)		
			Facility communications or alarm systems, fire control,	264a.1	264.33	H224
X	8.	spill control and decontamination equipment tested and maintained		265a.1	264.33	
			Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
X		movement of personnel and equipment during emergencies		265a.1	265.35	
			Contingency plan onsite and implemented	264a.1	264.51	H226
<u> </u>		Ĺ		265a.1	265.51	
	λ	Continute the ev	Contingency plan describes actin taken by personnel in	264a.1	264.52(a)	H227
^_			the event of an emergency	265a.1	265.52(a)	
	λ		Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
X			outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
			Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
\ 			addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	
	$\downarrow$		Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
			including location, physical description and capabilities to each item	265a.1	265.52(e)	
χ			Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
			possibility that evacuation could be necessary	265a.1	265.52(f)	

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### HAZARDOUS WASTE INSPECTION REPORT **TSD FACILITIES - PART B**

Site Name _	BSOC	ID Number	PADO48 603005	Date	2/2/04
			70001000		11107

#### **Hazardous Waste Inspection Report TSD Facilities - Part B**

1 - No Violation Observed'

2 - Not Applicable 3 - Not Determined

4 - Non Compliance

1 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X_			Part A permit application submitted	265a.1	265.1(b)	H200
×			Identification Number	265a.11	264.11	H201
$\lambda$			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
$\lambda$			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
×			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
×	{		Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
λ			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
×	,		Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
×			Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
×			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
×			Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
λ			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
λ			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215

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### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection $9/9/04$	Time start Time finish
Name of Inspector GERRY RADO	nMSKI i
Company, installation name	OWN SANITARY DISPOSAL CO (BSOC)
Location 300 MERKEC /	<u> </u>
County MONTCOMERY	Municipality <u>DOUGLASS</u> TWP
Identification number	3005
Name of responsible official	N FRAME
Title <u>PRESIDENT</u>	
Mailing Address 1205 F077	TOWN PIKE GLENMORE, MA 19342
Area code and telephone number	1-321-1236
Name of person interviewed	V FRAME
Mailing address (if different from above) _	
Area code and telephone number	
1. Site Characterization: Treat	nent Storage Disposal
Check all that apply:	•
☑ surface impoundments □	tanks I incineration
☐ chemical treatment ☐	containers
physical treatment	waste piles
☑ biological treatment □	containment bldg. 📈 landfill
	y
Does the facility generate hazardous was	ste? ☐ Yes 🔀 No
3. Types of hazardous waste produced by l	lazardous Waste Number:
·	
·	, ·
4. Are hazardous wastes transported off-sit	e by the facility?   Yes  No

Page \_\_\_\_\_ of \_\_\_\_

# HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - LANDFILLS

Site Name <u>BSDC</u> ID Number <u>PADD 48 GO3 OC</u>	ク <b>ケ</b> Date	9/16/	20
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1-No Violation Observed

2-Not-Applicable

3-Not-Determined

4-Non-Compliance

STATUS				CHAPTER	LINE	
1	2	3	4	REQUIREMENT	CITATION	NUMBER
X				Run-on diverted away from the facility	265.302(a)(1)	H425
×				Run-off collection system properly designed, constructed, operated and maintained	265.302(a)(2)	H426
<				Run-off collected from the active portions and managed as a hazardous waste if it is a hazardous waste	265.302(a)(2)	H427
	X			Facility is managed to prevent wind dispersal of hazardous waste	265.302(a)(4)	H428
	-	X		The exact location and dimension, including depth of each cell with respect to permanently surveyed benchmarks kept on map in operating record	265.309(1)	H429
		X		The contents of each cell and the approximate location of each hazardous waste type within each cell kept in operating record	265.309(2)	H430
			Х	Closure and post-closure requirements complied with	265.310	H431
	×			Ignitable and reactive wastes disposed with Department approval	265.312	H432
	X			Precautions taken for the disposal of incompatible wastes and materials	265.313	H433
	×			Hazardous wastes disposed contain greater than 20% solids content by dry weight, are not flowable and do not contain free liquid	265.314	H434
	X			Empty containers crushed flat, shredded or similarly reduced in volume before disposal	265.315	H435

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		×		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		Y		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X		Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

S	T	Α	Т	U	S

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Emergency coordinator designated and on the premises	264a.1	264.55	H232
	•	×		or on call	265a.1	265.55	
				Only Department approved manifest used, unless	264a.71		H233
	×			manifest not required by 40 CFR 262.20(e)	265a.71		
				Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234
	x				265a.71	265.71(a)(b)	
				Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235
	×			limits	265a.1	265.72(b)	
	X			Written operating record maintained on the premises	264a.1	264.73(a)	H236
	^				265a.1	265.73(a)	
				Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
	X			of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	,
				Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
	×			each hazardous waste	265a.1	265.73(b)(2)	
				Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
	ン			analyses and treatability tests	265a.1	265.73(b)(3)	
				Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
	X			incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	
	$ _{X}$			Written operating record contains records and results of	264a.1	264.73(b)(5)	H241
	,			all inspections	265a.1	264.73(b)(5)	
	×			Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
				testing and analytical data	265a.1	265.73(b)(6)	
	×	Ì		Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
				cost estimates	265a.1	265.73(8)	
ŀ	×	1		All records retained on premises and available for	264a.1	264.74	H244
L				inspection	265a.1	265.74	
		,		Biennial reports submitted on the Department's version of	264a.75	264.75	H245
	X		_	EPA Form 8700-13B	265a.75	265.75	
		×		Emissions, discharges, fires, explosions and groundwater contamination reported as required	264a.1 265a.1	264.77(a) 265.77(a)	H246
X	1-		m	Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		-	X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
		×	Γ	Groundwater quality assessment outline on the premises	265a.1	265.93	H249
						4.5	

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1 2 3 4			REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
T		Ň	Ignitable or reactive wastes separated from source of	264a.1	264.17(a)	H216
X			ignition or reaction	265a.1	265.17(a)	
		П	No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
X		1	from ignitable or reactive wastes	265a.1	265.17(a)	
			Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
X	,	,	or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
			Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
×			explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	<del></del> -
×			Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
$\perp$			immediate emergency instruction to personnel	265a.1	265.32(b)	
			Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
<u> </u>		<u>.                                    </u>	available at scene of operations	265a.1	265.32(b)	
			Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
			decontamination equipment	265a.1	265.32(c)	•
	×		Facility equipped with water at adequate volume and	264a.1	264.32(d)	H223
			pressure to supply fire control equipment	265a.1	265.32(d)	
			Facility communications or alarm systems, fire control,	264a.1	264.33	H224
	×		spill control and decontamination equipment tested and maintained	265a.1	264.33	·
			Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
×			movement of personnel and equipment during emergencies	265a.1	265.35	
	×		Contingency plan onsite and implemented	264a.1	264.51	H226
			·	265a.1	265.51	
	×		Contingency plan describes actin taken by personnel in	264a.1	264.52(a)	H227
	_		the event of an emergency	265a.1	265.52(a)	
			Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
	×		outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
			Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
	X		addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	
}			Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
	×		including location, physical description and capabilities to each item	265a.1	265.52(e)	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	V	<u> </u>	Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
			possibility that evacuation could be necessary	265a.1	265.52(f)	

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

•			•		1 1	į
Site Name	10	D Number _/	PADO48603005	Date	<u> 9   16   0</u>	<u>23</u>

## Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

H215

S	STATUS		3		DA OIT	FED OIT	LINE
· 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 	NO.
ſ	Ē	$\overline{\Box}$		Part A permit application submitted	265a.1	265.1(b)	H200
X				Identification Number	265a.11	264.11	H201
	×			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	×			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	×			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	×			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	×			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	×			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
×				Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
×				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
-	×			Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	×	1		Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		×		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
		×		Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	er.	×		Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214

264a.1

265a.1

264.16(d)

265.16(d)

Records retained for each employee at facility of training,

job title and job description



### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection $9/16/02$ Time	start Time finish
Name of Inspector GERRY RADOMS	<u> </u>
Company, installation name BOYERTOWN	SANITARY DISPOSAL CO. BSDC
· · · · · · · · · · · · · · · · · · ·	
County MONTSOMERY	Municipality <u>DOUGLASS</u> TWP
Identification number PAUC 48603005	
	RAME
Title PRESIDENT	
Mailing Address 1205 POTTS TOWN P	IKE GLENMORE, PA 19343
Area code and telephone number	
Name of person interviewed	
Mailing address (if different from above)	·
Area code and telephone number	
1. Site Characterization: Treatment	Storage Disposal
Check all that apply:	
	☐ incineration
☐ chemical treatment ☐ contain	ers 🔲 BIF
☐ physical treatment ☐ waste	oiles 🔲 recycle
	ment bldg. 🗵 landfill
Other Specify	
2. Does the facility generate hazardous waste?	☐ Yes ☑ No
3. Types of hazardous waste produced by Hazard	ous Waste Number:
4. Are hazardous wastes transported off-site by th	e facility?   Yes   No

Page \_\_\_\_ of \_\_\_\_\_

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Date of inspection

**ADDENDUM** 

Company/Facility/Site Name:

07/21/2006

a) Leachate enters the large raw leachate surface impoundment.

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

Warren Frame provided a brief outline of the treatment steps for the leachate generated by the landfill:

Identification Number:

Boyertown Landfill (aka Boyertown Sanitary Disposal "BSD"

e) Then the leachag) Finally the Warren Frame sa	le is then p leachate w	umped that ater is pu	ru large mped in	blue-onto eith	colored ner of t	carbon wo (2) s	tanks. Small tro	eated leac	hate surfa	ce impou	ındments
treatment process	at the air h	ouse stag	ge.		and HR	wasiii.	ng maci	nne occa	Sionally 1S	added to	ine
			-		,		-			•	
			<u>.</u>		٠.	,					
·			,	<u>,</u> 1		. ,					
•	• .					*	.·	;			
herein, or other violation This report do imply immunity from leg Signature by person was shown the r	es not constitued action for another person inte	a result of re ite an order of y violation no erviewed doe copy was left	eview of late or other apoted herein	poratory appealable n. essarily in person.	analyses action o	or Departi f the Depa	r violations ment recor artment. N	s may be iss ds. lothing conta dings on this	ined herein si	ing either vi hall be deen	ned to grant o

3ER-WM-129: Rev. 12/93

Person interviewed (signature)

Inspector (signature)

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

e of inspection07/21/200	6 Identification Number:	PAD 048603005
npany/Facility/Site Name:	Boyertown Landfill (aka Boyertown S	anitary Disposal "BSD")
e following violations were	noted:	
40 CFR 265.111(b) "Opera	ator prevents leachate from leaking into t	he ground"
40 CFR 265.92(a) "Ground 40 CFR 264.99(a) "Ground	lwater sampling plan developed and imp lwater monitoring performed"	lemented"
40 CFR 264.73(a),(b) "Wr	itten operating record"	
		•
recommended that Boyerto	wn Sanitary Disposal Company correct t	he violations listed above.
viewed the results of this ins	spection with Warren Frame prior to my	departure.
•		•
•		
•		
	•	
		,
•		
		·
	•	
	<del></del>	<u> </u>

mailed

8-25-2006

Date

Date

3ER-WM-129: Rev. 12/93

Person interviewed (signature)

Inspector (signature)

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

-		INSPECTION R	<b>EPORT COMME</b>	NTS
Date of inspection	07/21/2006	lden	tification Number:	PAD 048603005
Company/Facility/Si	te Name:	Boyertown Landfill	(aka Boyertown Sa	anitary Disposal "BSD")
On this date Charlie facility inspection.	e Fees of the F Warren Fram	PA DEP conducted a granted access.	hazardous waste, t	treatment, storage, and disposal (TSD)
The following obse	rvations were	made:		
1. The EPA assigned to its closing.	ed an identific	ation number to this	alandfill after it rep	ortedly accepted hazardous waste prior
2. At time of inspe board of the trea	ction the freebated impounds	ooard of the raw lead ments appeared to be	hate impoundment approx. 1½ feet.	appeared to be 2 feet, while the free
Warren Frame sa to be leaking by	nid that the im BSD.	poundment liners ha	we not been repaire	ed. The impoundments were determined
3. BSD has not sub 2003. (The Dep	omitted to the partment cond	Department quarterl ucted a sampling ev	y groundwater mor ent on May 17, 200	nitoring results since the 1 <sup>st</sup> quarter of 05.)
4. At time of inspesystem does not	ction, none of work because	the flares were worl	king. Warren Fram generate enough g	ne said that the newly installed flare gas to support combustion.
I did not detect a	ny landfill gas	s odors during today	's inspection.	
5. Warren Frame sa	aid the two tre	eated leachate surfac	e impoundments ha	ave a combined total of 135,837 gallons.
sewage treatmen	t plant. Also,	chemical analyses v	vere not available a	n leachate is discharged to the local t time of inspection. (Warren Frame ndfill maintenance building)
	• .		•	
herein, or other violations in This report does imply immunity from legal	dentified as a result not constitute an action for any violate person interviews	ig the inspection. Addition if of review of laboratory an order or other appealable a lition noted herein.	nal notification of violation alyses or Department rec- action of the Department.	resentative of the Department. This report is formans may be issued concerning either violations noted ords.  Nothing contained herein shall be deemed to grant of the findings on this report, but does acknowledge that the

mailed

8-25-06

Page 6 of 8

Date

Date

# Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

_1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		χ		Closure plan on the premises and up-to-date	265a.1	265.112	H250
		χ		Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		Ϋ́		Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		Х		Annual post-closure cost estimate on the premises and up- to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable 3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				Emergency coordinator designated and on the premises or	264a.1	264.55	H232
	_	X	<u> </u> -	on call	265a.1	265.55	
}				Only Department approved manifest used, unless manifest	264a.71		H233
	X	<u> </u>	┡	not required by 40 CFR 262.20(e)	265a.71		,
		l ·	١.	Manifest properly completed and routed within time limits.	264a.71	264.71(a)(b)	H234
$\vdash$	X	_	-		265a.71	265.71(a)(b)	
				Manifest discrepancies resolved or reported within time limits	264a.1	264.72(b)	H235
{	7	<u> </u>	├		265a.1	265.72(b)	<u>. L</u>
				Written operating record maintained on the premises	264a.1	264.73(a)	H236
$\dashv$		X_	-		265a.1	265.73(a)	
•				Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
_	X		_	of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	, .
				Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
4	X		Ļ	each hazardous waste	265a.1	265.73(b)(2)	
İ				Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
			X	analyses and treatability tests See "Comments" # 6	265a.1	265.73(b)(3)	
				Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
-		X_	<u> </u>	incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	
				Written operating record contains records and results of all	264a.1	264.73(b)(5)	H241
-		X	·	inspections	265a.1	264.73(b)(5)	,
	.	·		Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
$\dashv$	_	Λ_	ļ.,	testing and analytical data	265a.1	265.73(b)(6)	
				Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
4		X	_	cost estimates	265a.1	265.73(8)	
		v.		All records retained on premises and available for	264a.1	264.74	H244
4	-	Ă,	<u> </u>	inspection	265a.1	265.74	
				Biennial reports submitted on the Department's version of	264a.75	264.75	H245
-	겍		_	EPA Form 8700-13B	265a.75	265.75	<u> </u>
	.			Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246
$\dashv$	_	Х.	_	contamination reported as required	265a.1	265.77(a)	
χ				Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
		*	X	Approved groundwater sampling and analysis plan developed and implemented See "Comments" # 3	265a.1	265.92(a)	H248
	ł	X		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

## Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
X			Ignitable or reactive wastes separated from source of ignition or reaction	264a.1 265a.1	264.17(a)	H216
\X			No smoking signs displayed where the there are hazards from ignitable or reactive wastes	264a.1	265.17(a) 264.17(a)	H217
Y X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	265a.1 264a.1 265a.1	265.17(a) 264.17(b) 265.17(b)	H218
X			Facility maintained/operated to minimize possibility of fire, explosion or discharge of hazardous waste or hazardous constituents	264a.1 265a.1	264.31 265.31	H219
  X			Facility equipped with internal alarm capable of providing immediate emergency instruction to personnel	264a.1 265a.1	264.32(b) 265.32(b)	H220
X Y			Device for summoning outside emergency assistance available at scene of operations	264a.1 265a.1	264.32(b) 265.32(b)	H221
X			Facility equipped with fire control, spill control and decontamination equipment	264a.1 265a.1	264.32(c) 265.32(c)	H222
X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	264a.1 265a.1	264.32(d) 265.32(d)	H223
X			Facility communications or alarm systems, fire control, spill control and decontamination equipment tested and maintained	264a.1 265a.1	264.33 264.33	H224
X			Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies	264a.1 265a.1	264.35 265.35	H225
	X		Contingency plan onsite and implemented	264a.1 265a.1	264.51 265.51	H226
	x X		Contingency plan describes actin taken by personnel in the event of an emergency	264a.1 265a.1	264.52(a) 265.52(a)	H227
	X		Contingency plan describes arrangements agreed to for outside emergency services such as police and fire department, hospitals, contractors, etc.	264a.1 265a.1	264.52(c) 265.52(c)	H228
	X		Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator	264a.1 265a.1	264.52(d) 265.52(d)	H229
	X		Contingency plan contains list of emergency equipment including location, physical description and capabilities to each item	264a.1 265a.1	264.52(e) 265.52(e)	H230
	X		Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	264a.1 265a.1	264.52(f) 265.52(f)	H231

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name	ID Number	PAD 048 ( 63 005	Date July	21'200	Ç

## Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Part A permit application submitted	265a.1	265.1(b)	H200
X		1.		Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	X			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	X			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	ן ע	•		24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1)	H207
	X			Artificial barrier around active portion	264a.1 265a.1	265.14(b)(1) 264.14(b)(2)	H208
X	,			Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	265.14(b)(2) 264.14(c)	H209
		 X		Facility inspection schedule on-site	264a.1 265a.1	265.14(c) 264.15(a)(1) 265.15(b)(1)	H210
	Х	, 		Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15	200.10(0)(1)	H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
	X			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	χ			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16	H214
	Х			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	265.16 264.16(d) 265.16(d)	H215

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Time Start	July 21	2006
Time Finish		

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES – PART A

Company, installation name Beyontown Sanitary Disposal Co. (BSDC)
Name of Inspector Charles Fees
Location 300 Merkel Rd., Albertsville, PA. 19525
County Montgomeny Municipality Douglass Twp.
EPA I.D. Number PAD 048603005 Employer I.D. Number (EIN)
Name of responsible official Warnen Frame
Title President
Mailing Address 1205 Pottstown Pike Clehmoone, PA 19343
Area code and telephone number 610 331 - 1236
Name of person interviewed Warnen Frame
Mailing address (if different from above)
Area code and telephone number
1. Site Characterization: Treatment Storage Disposal
Check all that apply:
☐ chemical treatment ☐ containers ☐ BIF
☐ physical treatment ☐ waste piles ☐ recycle
M biological treatment
Containment blug. 🖂 landilli
Other Specify
2. Does the facility generate hazardous waste?   ☑ Yes ☐ No
3. Types of hazardous waste produced by Hazardous Waste Number:
F039 Mullisource Leachate
-   I TISOUTCE LEACHAIR
4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

EPA ID Numb	er	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Har	Handler Name				
PAD 048603005					Rova La	C	la b	, , , , o , T	
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	0 1		ATIONS	ECTION	uh Sa	nitary b	Isposal Co. To	
(Additional	Violations	can be added	l/updated/d	eleted usin	g the RC	RAInfo C	M&E Additiona	al Violations Form)	
VIOLATION	<b>⊠</b> Add	☐ Update	☐ Delete					ve Evaluation 🛚	
Seq. No	Violation Type 2(4, E Incom	Agency S	Determin (mm/dd 7/21/	2004	A F	Qualiti RTC Qualifi	pliance (RTC) fier er is required if stual RTC Date.	Actual RTC Date (mm/dd/yyyy)	
LINK CITATIO				YES M	NO $\Box$		If Van fill in	5-6	
Citation Type		Citation		1123 Ш	Citation Type		Citatio	information below	
F.R. L	10 CFR	264.7	3(a)		туре				
FR	264.	73(b)							
VIOLATION	Add	☐ Update	☐ Delete	)			Link to Abo	ve Evaluation 🏹	
Seq. No	Violation Type	Agency	Determine (mm/dd	<i>(уууу</i> )	A F	Qualific RTC Qualifie	Iliance (RTC) iler er is required if etual RTC Date.	Actual RTC Date (mm/dd/yyyy)	
LINK CITATIO	NS TO ABO	OVE VIOLATI	ON?	YES 🔀	NO $\square$		If Yes fill in	information below	
Citation Type	265.93	Citation	7		Citation Type		Citatio		
		HANDI	ED SECTIO	N (Fill and	4 # DODA				
landler Name		HANDL	ER SECTIO	(Fill ou			ifier)		
Street					Contac				
City			-	State			Zip Code		
County			1				* 1		
	UNI	VERSE CHA	NGE SECTI	ON (Fill or	t if Unive	rse Char	ge Required)		
. Indicate the		urrent Univers				oo ona.	ge Required)		
	e new RCRA	Info Generator	Universe:		l Non-Har	_QG 🔲	SQG Closed	CEG [	
iii. Indicate the (Only fill out if the transporter statu	e facility requ	orter status: ires a	If the transport least one mod	de of transpor	cked, you mitation below:	ust check a	Check non-tra currently list transporter AN	ransporter ansporter if the facility is ted in RCRAInfo as a ND no longer transport ardous waste.	

<sup>\*</sup>Required Fields

	UATION - VIO	LATION FORM	1640
*EPA ID Number PAD 048 403 0	05	EIN	1070
Handler Name Boxentown San	Hary Disho	sal Co. In	C-
Street 300 Merkel Rd.	7 1 1		
City Cibertsville State	PA	Zip Code	9525
Actual Generator Status  Check only if different from Notified Status.	sQG ☐ CES	QG Closed	Non-Handler
Universe Change Required? (Generator Status Change Required)  YES NO	If YES, complete the Univ	erse Change Section (on r	everse side of this form).
RCRA Non-Notifier? YES NO KITYES,	complete the Handler Secti	on (on reverse side of this	form).
Other Facility Information Changes? YES NO		landler Section (on reverse	
EVALUATION Add Update	Delete You	ou must provide an Eve own as the Sequence	aluation Identifier (also Number).
*Evaluation *Type *Evaluation Start Date (mm/dd/yyyy)	*Agency	Responsible Person	Suborganization
001 SAY 7/21/2004	5	CJF	that we WI
You need to specify Day Zero for all evaluation types except CDI, CSE SNY, and SNN, otherwise it defaults to Evaluation Start Date. For CD CSE, FUI, and SNY evaluations, you must select a previous CEI Start for the Day Zero. SNN evaluation type does not require a Day Zero.	FUI, alainy	Reclassified SV D Only applicable for SN's evaluation type as appropriate.	
Notes:			
BIF CCI CEI INC E	Use Only for Evaluation-Specific FCI LDR PTB OTHER (specify	on Type FCI)	btitle C
Does this Evaluation Add/Update/Delete a Violation?	Lygo (F) D	And the second of the policy of the second	ons Section(s) on page 2
Does this Evaluation link to a Commitment?	YES NO	of this form.  If Yes, please use the F	
	YES NO X	Information Requests a	and Commitments Form.
Does this Evaluation link to a 3007 Request?	YES NO	If Yes, please use the F Information Requests a	RCRAInfo 3007 and Commitments Form.
OUTSTANDING VIOLATIONS COVERED BY ABOVE E	VALUATION? YES	NO If Yes, fill	in information below.
*Seq. No. *Violation Type *Agency	*Regulation Citation (Type + Citation) (ex. FR 262.1)	n	*Date Determined (mm/dd/yyyy)
39 265. 5 40 0	2640919999		7-9-2004
38 265.A S 40 CF	R 265.1118	9	-9-2004

\*Required Fields

IR



### **Violation List**



#### **BOYERTOWN SANITARY DISPOS**

#### **GILBERTSVILLE**

#### PAD048603005

EPA Unaddressed SNC; N	EPA Addressed SNC: N	EPA SNC with Compliance Schedule Established: N
State Unaddressed SNC: Y	State Addressed SNC: N	State SNC with Compliance Schedule Established: N

### Show All Evaluations Enforcements

#### Show All

36 Violation(s) were found.

					Page	: 1				G	ю То		<b>\</b>
					Violatio	ns				Ev	aluations	En	forcements
	Act Loc		Type	Determined Date ¥	Deter By Agency	Resp Agency	Actual RTC Date	RTC Qual	Linked Citations	Count		Count	
1	PA	40	<u>264.E</u>	07/21/2006	S	S			264.73(b)	1	Show Evaluations	No e	enforcements found.
2	PA	41	265.F	07/21/2006	S	s			265.92(a)	1	Show Evaluations	No e	enforcements found.
3	PA	37	265.F	05/17/2005	s	S				1	Show Evaluations	No e	enforcements found.
4	PA	39	<u>264.N</u>	09/09/2004	s	S				2	Show Evaluations	No e	enforcements found.
5	PA	38	264.N	09/09/2004	S	S				2	Show Evaluations	No	enforcements found.
6	PA	34	<u>262.A</u>	09/16/2003	s	s				1	Show Evaluations	No e	enforcements found.
7	PA	33	262.A	09/16/2003	s	s				1	Show Evaluations		enforcements found.
8	PA	31	<u>264.G</u>	09/11/2000	S	S				3	Show Evaluations		enforcements found.
9	PA	32	<u>264.N</u>	09/11/2000	S	s				3	Show Evaluations		enforcements found.
10	PA	30	<u>264.N</u>	10/23/1995	s	S				1	Show Evaluations	3	Show Enforcements
11	PA	29	264.N	10/23/1995	S	S	09/11/2000	0		2	Show Evaluations	3	Show Enforcements
12	PA	23	264.G	05/04/1995	S	S	09/11/2000	0		1	Show Evaluations	3	Show Enforcements
13	PA	27	264.G	04/25/1995	S	s	09/11/2000	0		1	Show Evaluations	3	Show Enforcements
14	PA	26	262.A	03/23/1995	S	S	09/11/2000	0		1	Show Evaluations	3	Show Enforcements
15	PA	24	264.D	03/17/1995	S	S	09/11/2000	0		2	Show Evaluations	3	Show Enforcements

Violations deleted at remost at Stake

a start date of 4/18/07.

4. Regarding the violations specified: You have filled in only 2 outstanding violation and 1 RTC violation. However, in RCRAInfo there are 10 outstanding violations. I've attached the violation page from RCRAInfo. Please let me know which violations should be linked to the 4/18/07 inspection and whether any of the outstanding violations in RCRAInfo have already been RTC'd. If so, please provide the qualifier and RTC date. If we are missing any information (an inspection that RTC'd the violations, then please submit the Inspection Report and CME form for that inspection to me either by mail or fax). विस्तान राज्य विद्यासम्बद्धाः स्तरे देश

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างให้เกิดที่เลือดีกับสามารถ เรียก เหมือน CME เป็นเรียกให้เกิดการ เรียก

Hed by Susio Chr.

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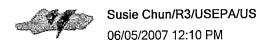
[attachment "boyertown violation list.htm" deleted by Susie Chun/R3/USEPA/US]

If you have any questions or need additional information please let me know.

:5

Thank you,

Susie Chun **Environmental Scientist** US EPA Region III Technical Support Branch (3WC11) Waste and Chemicals Management Division on Should be unable to the should be u Philadelphia, PA 19103 Phone- (215) 814-2469 Fax - (215) 814-3113 chun.susie@epa.gov



To kbauer@state.pa.us

cc Claudette Reed/R3/USEPA/US@EPA

bcc Susie Chun/R3/USEPA/US@EPA

Subject Fw: Boyertown Sanitary Disposal Co. - PAD048603005

#### Kevin,

Thank you for all the information in cleaning up this data. This is just to confirm what we discussed on the phone.

I will be changing Violation Seg # 30 to 265.G with a citation of 265.111 (determined date 10/23/1995) I will be changing Violation Seq # 34 to 264.F with a citation of 264.99(a) I will also be keeping Violation Seq 40.

amp this data. This is

5.C with a citation of

The with a citation of

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the ontstanding vi

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Amsweatjansover

All other violations will be deleted except 40 and 41 whater 6000 All evaluation after 1995 will be linked to the outstanding violations of 30. All evaluations after 2003 will be linked to the outstanding violations of 30 and 34. bo. Susie Cha-

Violation Seq 41 will be RTC with the 4/18/07 inspection have at

If you have any questions or need additional information please let me know.

Thank you,

Susie Chun

**Environmental Scientist** 

US EPA Region III

Technical Support Branch (3WC11)

Waste and Chemicals Management Division

1650 Arch Street

Philadelphia, PA 19103

Phone- (215) 814-2469

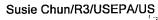
Fax - (215) 814-3113

chun.susie@epa.gov

----- Forwarded by Susie Chun/R3/USEPA/US on 06/05/2007 12:05 PM

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. +1



05/30/2007 02:11 PM

aulona alfibrismichleræstate.pa.us

::/ tCC3 @laudette; Reed/R3/USEPA/US@EPA

Subject Boyertown Sanitary Disposal Co. - PAD048603005

``31£..

Stud with a citation con-4.F with a citation or

Susan,

- Danos Hisbation This e-mail is in regards to an inspection performed on 4/18/07 at Boyertown Sanitary. The following needs clarification before the CME forms can be inputted into RCRAInfo.

- 1. SNY evaluations are never linked to violations, in the future, you need to submit one CME form for the violation and a separate CME form for the SNY evaluation of his is also the case for SNN.
- 2. From what I can gather, you want the Day Zero for the SNY to be 9/9/04.
- 3. I will add an CME form with a CEI evaluation for the date of 4/18/07. The SNY CME form will also have

in 199. Qualdeco Sig LICH Boyertown .

C. With a product I THE REPORT OF THE PARTY OF THE . ER-WM-129: Rev. 7/95

## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

			Inspection	on Report Com	ments	
Date o	of Ins	spection	4/18/2007	Identifi	.cation Number_PA	D048603005
Compar	ny/Fac	cility/Si	te Name Boyertown	Sanitary Disposal	Company	
5)		Section 26	ns noted in paragraphs 4.73 (a) and (b) ("Wri			
,	a. b. c.	40 CFR	Section 265.111 (b) "G Section 265.92 (a) "G Section 264.99 (a) "G	roundwater sampling	plan developed and	
6)	BSDC clearing observations single	This COng, grubbing ded to have ded to have ded to facility	rder (CO) was issued or required the responsible ag and excavation (LCG) been brought onsite. So rea. BSDC is reminded or. Mr. Frame pledged to (30) days of this inspect	e parties to remove and E). At the time of insponent remaining material that the stumps, branch be have the remaining ex	I properly dispose of ection, no new LCGE was observed to have and roots should be posed branches remo	waste from land E waste was we been moved to be disposed of at a lived from the clear
In sumi	mary, t	hree (3) ou	tstanding violations ren	nain. A copy of this rep	port was mailed to the	e facility.
Departm Additio violati Th contain herein.	ent, 7 mal not ons ide is repo ed here	This report ification entified as ort does no ein shall b	ort is notice of the f. is formal notification of violations may be is a result of review of the constitute an order of the deemed to grant or interviewed does in the constitute of the constitute of the constitute of the constitute of the constitute of the constitute of the constitute of the constitute of the constitute of the constitute of the constitution of the	n of any violations obs ssued concerning either laboratory analyses of or other appealable act mply immunity from lega	served during the ins r violations noted he r Department records. tion of the Departmen al action for any vio	pection. rein, or other t. Nothing lation noted
report,	but do	es acknowl	edge that the person w	as shown the report or		
Perso	n int	erviewe	d (signature) <u>M</u>	arted to Facilly	Date_	4/23/2007
Inspe	ctor	(signati	ire) Ann Mu	h	Date_	4/23/2007

Page\_7\_of\_7\_

ER-WM-129: Rev. 7/95

## Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

### Inspection Report Comments

Date (	of Inspection _	4/18/2007	Identific	cation Number PA	D048603005
Compai	ny/Facility/Sit	e Name Boyertown Sa	anitary Disposal (	Company	<del></del>
Sanitar	ent, storage and dis y Disposal Compar ent, granted access	n Michler and Charlie Fosal (TSD) inspection any (BSDC), located in Dotto the facility and was the	and a municipal waste ouglass Township, Mo	compliance inspect ontgomery County.	ion at Boyertown Mr. Warren Frame,
1)	Mr. Frame explain had not been repair of inspection, lago approximately two	pection, the treated and red that the impoundmented. A large break/fold from A was being dischargelye to fourteen (12-14) of minute. At the time of i	nt liner, which was det in the liner was observ ged to the sewer autho days to discharge beca	ermined to have beeved in the treated lagarity. Mr. Frame states are the can only discusse he can only discusse he can only discussed.	en leaking by BSDC, goon A. At the time ted that takes charge a maximum
2)	At the time of insp	ection, the main gas flan	re was not on. No land	dfill gas odors were	detected.
3)	one (1) batch. The Samples are sent to raw leachate samp	s treated leachate sample e leachate samples are co o Blue Marsh Laborator les are collected and ana mually. Chemical analy	ollected from in betwe ies, located in Douglas alyzed annually, and a	en the two (2) carbo ssville PA. Mr. Fran priority pollutant te	on columns.  me explained that  st is analyzed on the
4)	This report include discharged, pH, ca reports, BSDC disc The Department re December. BSDC	ations reports for the treates the hours of operation rbon change date, and charges an average of 14 ecommends that Mr. Fratis reminded that they shall levels and liner condition	t, basin utilized (A or I omments (when sock to 10,000 gallons from la me obtain a copy of the nould be conducting re-	B), flowmeter readir filter was replaced). goons A and B ever the monthly operation of the control of the contr	ngs, gallons According to these y two (2) months. ns report for the lagoons,
Departm Additio Violati Th Contain Derein. Si	ent. This report nal notification of one identified as a is report does not ed herein shall be gnature by the pers	rt is notice of the find is formal notification of violations may be issued result of review of land constitute an order or deemed to grant or impusion interviewed does not dige that the person was	of any violations obse ued concerning either aboratory analyses or other appealable acti ly immunity from legal t necessarily imply co	erved during the instance violations noted he Department records. ion of the Departmer action for any viconcurrence with the	spection. erein, or other nt. Nothing plation noted findings on this
Perso	n interviewed	(signature)	who & failify	Date_	4/23/2007
Inspe	ctor (signatur	ce) Avon Mich		Date_	4/23/2017
		/			Page 6 of 7

### Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3_	4 REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
		X	Closure plan on the premises and up-to-date	265a.1	265.112	H250
		Х	Post-closure plan on the premises and up-to-date	265a.1	265.118	H251
		X	Annual closure cost estimate on the premises and up-to-date	264a.1 265a.1	265.142 264.142	H252
		X	Annual post-closure cost estimate on the premises and up-to-date	264a.1 265a.1	264.144 265.144	H253

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined 4 - Non Compliance

. 2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X		Emergency coordinator designated and on the premises or	264a.1	264.55	H232
_			on call	265a.1	265.55	
X		'	Only Department approved manifest used, unless manifest	264a.71		H233
			not required by 40 CFR 262.20(e)	265a.71		
x			Manifest properly completed and routed within time limits	264a.71	264.71(a)(b)	H234
_	1_	L		265a.71	265.71(a)(b)	
X			Manifest discrepancies resolved or reported within time	264a.1	264.72(b)	H235
	ļ	ļ_	limits	265a.1	265.72(b)	
	X		Written operating record maintained on the premises	264a.1	264.73(a)	H236
_	_	L		265a.1	265.73(a)	
X			Written operating record contains description and quantity	264a.1	264.73(b)(1)	H237
			of waste received and method of treatment, storage or disposal	265a.1	265.73(b)(1)	
X			Written operating record contains location and quantity of	264a.1	264.73(b)(2)	H238
		L	each hazardous waste	265a.1	265.73(b)(2)	
		X	Written operating record contains results of waste	264a.1	264.73(b)(3)	H239
			analyses and treatability tests	265a.1	265.73(b)(3)	
	X	Ì	Written operating record contains reports and details of all	264a.1	264.73(b)(4)	H240
			incidents that required implementing the contingency plan	265a.1	265.73(b)(4)	
	X		Written operating record contains records and results of all	264a.1	264.73(b)(5)	H241
			inspections	265a.1	264.73(b)(5)	
İ	X		Written operating record contains required monitoring,	264a.1	264.73(b)(8)	H242
		L.	testing and analytical data	265a.1	265.73(b)(6)	
	X		Written operating record contains closure and post-closure	264a.1	264.73(8)	H243
			cost estimates	265a.1	265.73(8)	
	X	}	All records retained on premises and available for	264a.1	264.74	H244
			inspection	265a.1	265.74	
X			Biennial reports submitted on the Department's version of	264a.75	264.75	H245
			EPA Form 8700-13B	265a.75	265.75	
	x		Emissions, discharges, fires, explosions and groundwater	264a.1	264.77(a)	H246
	Ш		contamination reported as required	265a.1	265.77(a)	
			Groundwater monitoring wells located at approved sites	265a.1	265.91	H247
	·	X	Approved groundwater sampling and analysis plan developed and implemented	265a.1	265.92(a)	H248
	x		Groundwater quality assessment outline on the premises	265a.1	265.93	H249

### Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
X			Ignitable or reactive wastes separated from source of	264a.1	264.17(a)	H216
1_	<u> </u>	L.	ignition or reaction	265a.1	265.17(a)	
x		i	No smoking signs displayed where the there are hazards	264a.1	264.17(a)	H217
	<u> </u>		from ignitable or reactive wastes	265a.1	265.17(a)	
X			Treatment, storage, disposal of ignitable or reactive wastes	264a.1	264.17(b)	H218
			or mixing of incompatible wastes or materials conducted according to requirements	265a.1	265.17(b)	
X			Facility maintained/operated to minimize possibility of fire,	264a.1	264.31	H219
			explosion or discharge of hazardous waste or hazardous constituents	265a.1	265.31	
Х			Facility equipped with internal alarm capable of providing	264a.1	264.32(b)	H220
_			immediate emergency instruction to personnel	265a.1	265.32(b)	
Х			Device for summoning outside emergency assistance	264a.1	264.32(b)	H221
			available at scene of operations	265a.1	265.32(b)	
Х			Facility equipped with fire control, spill control and	264a.1	264.32(c)	H222
			decontamination equipment	265a.1	265.32(c)	
X			Facility equipped with water at adequate volume and	264a.1	264.32(d)	H223
			pressure to supply fire control equipment	265a.1	265.32(d)	
Χ			Facility communications or alarm systems, fire control, spill	264a.1	264.33	H224
			control and decontamination equipment tested and maintained	265a.1	264.33	
Χ			Adequate aisle space maintained to allow unobstructed	264a.1	264.35	H225
			movement of personnel and equipment during emergencies	265a,1	265.35	
	X		Contingency plan onsite and implemented	264a.1	264.51	H226
				265a.1	265.51	
	X		Contingency plan describes actin taken by personnel in the	264a.1	264.52(a)	H227
			event of an emergency	265a.1	265.52(a)	
	X		Contingency plan describes arrangements agreed to for	264a.1	264.52(c)	H228
			outside emergency services such as police and fire department, hospitals, contractors, etc.	265a.1	265.52(c)	
	Х		Contingency plan contains an up-to-date list of names,	264a.1	264.52(d)	H229
			addresses and phone numbers of all persons qualified to act as emergency coordinator	265a.1	265.52(d)	
	X		Contingency plan contains list of emergency equipment	264a.1	264.52(e)	H230
			including location, physical description and capabilities to each item	265a.1	265.52(e)	
	X		Contingency plan contains an evacuation plan if there is a	264a.1	264.52(f)	H231
			possibility that evacuation could be necessary	265a.1	265.52(f)	

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART B

Site Name Boyertown Sanitary Disposal Co. ID Number PAD048603005 Date 4/18/2007

### Hazardous Waste Inspection Report TSD Facilities - Part B

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined

4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
Χ				Part A permit application submitted	265a.1	265.1(b)	H200
Χ				Identification Number	265a.11	264.11	H201
	X			Wastes accepted at facility transported by haulers licensed by DEP to transport hazardous waste	264a.11 265a.11		H202
	X			Waste streams not covered by permit approved by DEP before acceptance	264a.13 265a.13		H203
	Х			Chemical and physical analysis repeated as required	264a.13 265a.13	264.13 265.13	H204
	Х			All waste shipments inspected and analyzed when necessary	264a.13 265a.13	264.13 265.13	H205
	X			Waste analysis plan on-site	264a.1 265a.13	264.13(b) 265.13(b)	H206
	X			24 hr. surveillance at active portion	264a.1 265a.1	264.14(b)(1) 265.14(b)(1)	H207
	X			Artificial barrier around active portion	264a.1 265a.1	264.14(b)(2) 265.14(b)(2)	H208
Х				Proper signs posted at each entrance, minimum 4 inch lettering	264a.1 265a.1	264.14(c) 265.14(c)	H209
		Х		Facility inspection schedule on-site	264a.1 265a.1	264.15(a)(1) 265.15(b)(1)	H210
	X			Facility construction schedule submitted to Department for inspection and approval	264a.15 265a.15		H211
		X		Maintenance schedule onsite for equipment or structures which reveal deterioration or malfunction	264a.1 265a.1	264.15(c) 265.15(c)	H212
	Х			Immediate remedial action taken where a hazard is imminent or has already occurred	264a.1 265a.1	264.15(d) 265.15(d)	H213
	X			Approved on the job or classroom personnel training program implemented	264a.1 265a.1	264.16 265.16	H214
	X			Records retained for each employee at facility of training, job title and job description	264a.1 265a.1	264.16(d) 265.16(d)	H215

2510-FM-BWM0302 6/2005 Part A

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

Inspection Date	4/18/2007
Time Start	/ /
Time Finish	

### HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES – PART A

1/w. 16/4399 mw: 16/6403

Company, installation name Boyertown Sa	anitary Disposal Company
Name of Inspector Susan Michler and Cha	arlie Fees
Location 300 Merkel Rd. Gilbertsville PA	19525
County Montgomery	Municipality <u>Douglass Twp.</u>
EPA I.D. Number <u>PAD048603005</u>	Employer I.D. Number (EIN)
Name of responsible official Warren Fram	<u>e</u>
Title President	
Mailing Address 1205 Pottstown Pike Gle	nmoore PA 19343
Area code and telephone number 610321	-1236
Name of person interviewed Warren Fram	ne
Mailing address (if different from above)	<u> </u>
Area code and telephone number	
1. Site Characterization:	eatment Storage Disposal
Check all that apply:	•
⊠ surface impoundments	tanks incineration
chemical treatment	containers
physical treatment	waste piles
	containment bldg.   landfill
☐ Other Spe	ecify
2. Does the facility generate hazardous v	vaste? ⊠ Yes □ No
Types of hazardous waste produced b     F039 Multisource leachate	y Hazardous Waste Number:
4. Are hazardous wastes transported off-	site by the facility?

RCRAInfo CM&E Evaluation-Violation Form, \*Page 2 **EPA ID Number** Handler Name PAD048603005 Boyertown Sanitary Disposal Co. **VIOLATIONS SECTION** (Additional Violations can be added/updated/deleted using the RCRAInfo CM&E Additional Violations Form) VIOLATION Add □ Update Delete Link to Above Evaluation Violation **Determined Date** Return to Compliance (RTC) Actual RTC Date Seq. No Agency Туре (mm/dd/yyyy) Qualifier (mm/dd/yyyy) A RTC Qualifier is required if 264.E S 7/21/2006 D 4/18/2007 entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? YES X NO If Yes, fill in information below Citation Citation Citation Туре Type FR 264.73 (a)(b) VIOLATION Add ☐ Update Delete Link to Above Evaluation Violation **Determined Date** Return to Compliance (RTC) Actual RTC Date Seq. No Agency (mm/dd/yyyy) Type Qualifier (mm/dd/yyyy) A RTC Qualifier is required if entering an Actual RTC Date. Notes: LINK CITATIONS TO ABOVE VIOLATION? YES NO If Yes, fill in information below Citation Citation Citation Citation Type Type HANDLER SECTION (Fill out if RCRA Non-Notifier) Handler Name Contact Street City State Zip Code County UNIVERSE CHANGE SECTION (Fill out if Universe Change Required) i. Indicate the Facility's current Universe(s): ii. Indicate the new RCRAInfo Generator Universe:

LQG

Non-Handler

Transporter

least one mode of transportation below:

Air

Rail

Highway

If the transporter box is checked, you must check at

Water

Other

SQG

Closed

CEG

Non-Transporter

Check non-transporter if the facility is

transporter AND no longer transports

hazardous waste

currently listed in RCRAInfo as a

\*Required Fields

cannot be made using this form

transporter status change)

iii. Indicate the new transporter status:

(Only fill out if the facility requires a

Note: All TSD activity changes must be handled by the IOR and

March 2006

### RCRAInfo CM&E EVALUATION - VIOLATION FORM

*EPA ID I	PAD048603005		EIN					
Handler Name		Boyertown Sanita	ary Dispos	sal Co.				1
Street	300 Merkel P	ld.			1351.2			
City	Gilbertsville		State	PA	Zip	Code	19525	- /
	enerator Status	The Court of the C	QG 🗆	sqg 🗌	CESQG		Closed Non-Handler	. 🗆
	Change Requir Status Change R		NO 🛛	If YES, complete t	he Universe	Change S	ection (on reverse side of this form	).
RCRA No	n-Notifier?	YES NO	If YES,	complete the Handle	er Section (c	n reverse s	side of this form).	Eig.
Other Fac	cility Informatio	n Changes? YES	□ NO	If YES, comple	te the Hand	ler Section	(on reverse side of this form).	
*EVALU	ATION 🖂	Add Upda	ate [	Delete	You m	ust provi	ide an Evaluation Identifier (a Sequence Number).	ilso
*Evalua Identifi	Lyna	*Evaluation St. (mm/dd/yy		*Agency	A STATE OF THE STA	esponsib Person		n
0	SMY	4/18/200	7	S		SBM	WM	
SNY, and S CSE, FUI,	SNN, otherwise it de and SNY evaluation: Zero. SNN evaluati	or all evaluation types exc faults to Evaluation Start E s, you must select a previ ion type does not require a	Date. For CD ous CEI Star	E, FUI, 9/9/2	e e		fied SV Date: ble for SNY vpe as	
	Notes							
	☐ Citizen Com		ion Indicat edia Inspe	ction	ll that apply Sampling	<i>'</i> )	Not Subtitle C	
		Focused Covera	age Areas	(Use Only for Ev	aluation T	vpe FCI)		
				tion-Specific FCI				
		CI CFI	INC [	LDR 🗆	РТВ 🗌	PTX		. 1
	THI 📗 U	ic   uoi	UWR [	OTHER (s	pecify):			
	CAR C	PC DOS D	EMR [	IEI 🗆	ISI 🗆	RTI		
Does this	Evaluation Add	d/Update/Delete a Vi	iolation?			1 000	the Violations Section(s) on page	e 2
				YES NO	of	this form.		
Does this	Evaluation link	to a Commitment?		YES NO	⊠ Inf	ormation F	e use the RCRAInfo 3007 Requests and Commitments Fori	m.
Does this	Evaluation link	to a 3007 Request?	?	YES NO			e use the RCRAInfo 3007 Requests and Commitments Fori	m.
DUTSTAN	IDING VIOLATION	ONS COVERED BY	ABOVE E	VALUATION?			f Yes, fill in information below	-
*Seq. No	. *Violation	Type *Agency		*Regulation ( (Type + Cita (ex. FR 26	ation)		Date Determined (mm/dd/yyyy)	
34	264.F	S		-264.99 (	-		9/9/2004 %	1843
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	The state of the s		- 19 - 19 - 10		500			
				*				

\*Required Fields

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	9950 Regulatory Citations
7. Samples from background and downgradient wells must be properly collected	• use of sample containers that may interfere with sample quality (e.g., synthetic containers used with volatile samples).	\$265.90(a) \$265.92(a) \$265.93(d)(4) \$270.14(c)(4)
and analyzed. (Continued)	• failure to make proper use of sample blanks.	\$265.90(a) \$265.92(a) \$265.93(d)(4) \$270.14(c)(4)

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
4. Background wells	• improper drilling methods were used,	§265.90(a)
must be	possibly contaminating the formation.	§265.91(a)
constructed so as to yield samples that are	<ul> <li>well intake packed with materials that may contaminate sample.</li> </ul>	§265.90(a) §265.91(a), (c)
representative of in-situ ground-water quality.	<ul> <li>well screens used are of an inappropriate length.</li> </ul>	§265.90(a) §265.91(a)(1, 2)
(Continued)	<ul> <li>wells developed using water other than formation water.</li> </ul>	§265.90(a) §265.91(a)
	<ul> <li>improper well development yielding samples with suspended sediments that may bias chemical analysis.</li> </ul>	§265.90(a) §265.91(a)
	• use of drilling muds or nonformation water during well construction that can bias results of samples collected from wells.	§265.90(a) §265.91(a)
5. Downgradient monitoring wells	<ul> <li>wells not placed immediately adjacent to waste management area.</li> </ul>	§265.90(a) §265.91(a)(2)
must be located so as to ensure the immediate	<ul> <li>failure of o/o to consider potential pathways for dense immiscibles.</li> </ul>	§265.90(a) §265.91(a)(2)
detection of any contamination	<ul> <li>inadequate vertical distribution of wells in thick or heavily stratified aquifer.</li> </ul>	§265.90(a) §265.91(a)(2)
migrating from the facility.	<ul> <li>inadequate horizontal distribution of wells in aquifers of varying hydraulic conductivity.</li> </ul>	§265.90(a) §265.91(a)(2)
	<ul> <li>likely pathways of contamination (e.g., buried streams channels, fractures, areas of high permeability) are not intersected by wells.</li> </ul>	§265.90(a) §265.91(a)(2)
	<ul> <li>well network covers uppermost but not interconnected aquifers.</li> </ul>	§265.90(a) §265.91(a)(2)

ſ	Examples of Basic			. 9950
	Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Ci	tations
	3. Background wells must be located so as to yield	<ul> <li>failure of the o/o to consider the effect of local withdrawal wells on ground-water flow-direction.</li> </ul>	§265.90(a) §265.91(a)(1)	,
	samples that are not affected by the facility.	• failure of the o/o to obtain sufficient water level measurements.	\$265.90(a) \$265.91(a)(1)	
		<ul> <li>failure of the o/o to consider flow path of dense immiscibles in establishing upgradient well locations.</li> </ul>	§265.90(a) §265.91(a)(1)	
`	,	<ul> <li>failure of the o/o to consider seasonal fluctuations in ground-water flow direction.</li> </ul>	§265.90(a) §265.91(a)(1)	
		o failure to install wells hydraulically upgradient, except in cases where upgradient water quality is affected by the facility (e.g., migration of dense	§265.90(a) §265.91(a)(1)	
,		immiscibles in the upgradient direction, mounding water beneath the facility).  failure of the o/o to adequately characterize subsurface hydrogeology.	§265.90(a) §265.91(a)(1)	(
		wells intersect only ground water that flows around facility.	\$265.90(a) \$265.91(a)(1)	
4	must be constructed so as	wells constructed of materials that may release or absorb constituents of concern	§265.90(a) §265.91(a)	
	that are	wells improperly sealed—contamination of sample is a concern.	§265.90(a) §265.91(a), (c)	٠
	representative of in-situ ground-water quality.	nested or multiple screen wells are used and it cannot be demonstrated that there has been no movement of ground water between strata.	§265.90(a) §265.91(a)(1, 2)	

Examples of Basic 9950			
Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citation	is
7. Samples from		§265.90(a)	Name and Advanced
background and	• samples collected with a device that is	\$265.92(a)	
downgradient	constructed of materials that interfere	§265.93(d)(4)	
•	with sample integrity.	§270.14(c)(4)	
wells must-be		\$270.14(C)(~)	
properly collected	• samples collected with a non-dedicated	§265.90(a)	
and analyzed.	sampling device that is not cleaned	§265.92(a)	
(Continued)	between sampling events.	§265.93(d)(4)	
		§270.14(c)(4)	
	• improper use of a sampling device such	§265.90(a)	
	that sample quality is affected (e.g.,	§265.92(a)	
	degassing of sample caused by agitation	§265.93(d)(4)	
	of bailer).	§270.14(c)(4)	
	• improper handling of samples (e.g.,	§265.90(a)	
•	failure to eliminate headspace from	§265.92(a)	
and the second s	containers of samples to be analyzed for	§265.93(d)(4)	
	volatiles).	§270.14(c)(4)	
· · · · · · · · · · · · · · · · · · ·			<b>'~</b>
	• failure of the sampling plan to establish	§265.90(a)	,
	procedures for sampling immiscibles	§265.92(a)	
· .	(i.e., "floaters" and "sinkers").	§265.93(d)(4)	
		§270.14(c)(4)	
	• failure to follow appropriate QA/QC	§265.90(a)	
	procedures.	§265.92(a)	
		§265.93(d)(4)	•
		§270.14(c)(4)	-
			γ.
	• failure to ensure sample integrity through	§265.90(a)	
	the use of proper chain-of-custody	§265.92(a)	
	procedures.	§265.93(d)(4)	
		§270.14(c)(4)	•
-	<ul> <li>failure to demonstrate suitability of</li> </ul>	§265.90(a)	
	methods used for sample analysis (other	§265.92(a)	
	than those specified in SW-846).	§265.93(d)(4)	
		§270.14(c)(4)	
	• failure to perform analysis in the field on	§265.90(a)	
	unstable parameters or constituents (e.g.,	\$265.92(a)	
4			
	pH, Eh, specific conductance, alkalinity, dissolved oxygen).	§265.93(d)(4)	

F Pe	Examples of Basic Elements Required by erformance Standards	Examples of Technical Inadequacies that may Constitute Violations	995  Regulatory Citations
6.	Downgradient	See No. 4 above.	
	monitoring wells must be		
	constructed so as		
	to yield samples		
	that are		
	representative of		
·	in-situ ground-	1	
	water quality.		
	•		
	Samples from background and downgradient wells must be	<ul> <li>failure to evacuate stagnant water from the well before sampling.</li> </ul>	§265.90(a), §265.92(a) §265.93(d)(4) §2705.14(c)(4)
í	properly collected	• failure to sample wells within a	§265.90(a)
i e	and analyzed.	reasonable amount of time after well	§265.92(a)
	and analyzed.	evacuation.	§265.93(d)(4)
			§270.14(c)(4)
·		• improper decisions regarding filtering	§265.90(a)
		or non-filtering of samples prior to	§265.92(a)
		analysis (e.g., use of filtration on	§265.93(d)(4)
		samples to be analyzed for volatile	§270.14(c)(4)
:		organics).	
]- '			,
		• use of an inappropriate sampling	§265.90(a)
		device.	§265.92(a)
	,		§265.93(d)(4)
			§270.14(c)(4)
		• use of improper sample preservation	§265.90(a)
		techniques.	§265.92(a)
<u>.</u>		•	§265.93(d)(4)
			§270.14(c)(4)

Figure 4.3
Relationship of Technical Inadequacies to
Ground-Water Performance Standards

Examples of Basic Elements Required by Performance Standards	Examples of Technical Inadequacies that may Constitute Violations	Regulatory Citations
1. Uppermost Aquifer	failure to consider aquifers	§265.90(a)
must be correctly	hydraulically interconnected to the	§265.91(a)(1, 2)
identified.	uppermost aquifer.	§270.14(c)(2)
		60.CE 00.C-)
	• incorrect identification of certain	§265.90(a)
	formations as confining layers or	§265.91(a)(1, 2)
	aquitards.	§270.14(c)(2)
	• failure to use test drilling and/or soil	§265.90(a)
•	borings to characterize subsurface	§265.91(a)(1, 2)
	hydrogeology.	§270.14(c)(2)
and the second s	.,,	3210.17(C)(2)
2. Ground-water flow	• failure to use piezometers or wells to	§265.90(a)
directions and rates	determine ground-water flow rates and	§265.91(a)(1, 2)
must be properly	directions (or failure to use a sufficient	§270.14(c)(2)
	number of them).	:
determined.		
en en en en en en en en en en en en en e	<ul> <li>failure to consider temporal variations</li> </ul>	§265.90(a)
	in water levels when establishing flow	§265.91(a)(1, 2)
	directions (e.g., seasonal variations,	§270.14(c)(2)
	short-term fluctuations due to	
·	pumping).	
	• failure to assess significance of vertical	§265.90(a)
	gradients when evaluating flow rates	§265.91(a)(1, 2)
	and directions.	§270.14(c)(2)
		: :
	• failure to use standard/consistent	§265.90(a)
	benchmarks when establishing water	§265.91(a)(1, 2)
	level elevations.	\$270.14(c)(2)
	o failure of the annual and the failure	9965 004 >
	• failure of the owner/operator (o/o) to	§265.90(a)
	consider the effect of local withdrawal	§265.91(a)(1)
	wells on ground-water flow direction.	
	e failure of the Alata abtain aufficient	\$268 00(~)
	• failure of the o/o to obtain sufficient water level measurements.	\$265.90(a)
	waici icvci uscasuicilicilis.	§265.91(a)(1)

	Y/N
VIII. Conclusions	
A. Is the facilitycurrently operating under the correct monitoring progaram according to the statistical analyses performed by the current operator?	IN-
3. Does the ground-water monitoring system, as designed and operated, allow for detection or assessment of any possible ground-water contamination caused by the facility?	N
Does the sampling and analysis procedures permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility?	N
	(
	,
	•

		9950	2.2
	Y	/N	
2. Documentation of analytical results for:			
a. Blanks?	N'	/N.	
b. Standards?		1.7	
c. Duplicates?			
d. Spiked samples?			4
e. Detectable limits for each parameter being analyzed?		*	-
C. Are approved statistical methods used?			
D. Are QC samples used to correct data?			
E. Are all data critically examined to ensure it has been properly calculated and reported?			
VII. Surficial Well Inspection and Field Observation			,
A. Are the wells adequately maintained?			
B. Are the monitoring wells protected and secure?		ı	Ş
C. Do the wells have surveyed casing elevations?	.1		
D. Are the ground-water samples turbid?			·
E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)?			
F. Has a site sketch been prepared by the field inspector with scale, north arrow, location(s) of buildings, location(s) of regulated units, locations of monitoring wells, and a rough depiction of the site drainage pattern?			· -

	Y	Y/N
—Unusual well recharge rates?	1	1//4.
—Equipment malfunction(s)?		1
—Possible sample contamination?		
—Sampling rate?		
D. Chain-of-Custody Record		
1. Is a chain-of-custody record included with each sample?		·
2. Does it document the following:		
a. Sample number?		
b. Signiture of collector?		
c. Date and time of collection?	, 	
d. Sample type?	· ·	
e. Station location?		
f. Number of containers?		
g. Parameters requested?	<del></del>	
h. Signatures of persons involved in chain-of-custody?	<del></del>	
i. Inclusive dates of custody?	<del></del>	
E. Sample Analysis Request Sheet  1. Does a sample analysis request sheet accompany each sample?	1	
2. Does the request sheet document the following:		
a. Name of person receiving the sample?		
b. Date of sample receipt?		
c. Duplicates?		
d. Analysis to be performed?	- ·	
IV. Review of Quality Assurance/Quality Control		
A. Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program?		
B. Does the QA/QC program include:		
1. Documentation of any deviation from approved procedures?		
	$\bigvee$	/ .

		995
V Parious of Chair of Care I Pa	1	Y/N
V. Review of Chain-of-Custody Procedures		
A. Sample Labels		
	11	/n '
1. Are sample labels used?	12/	14
2. Do they provide the following information:		
a. Sample identification number?		·.
b. Name of collector?		
c. Date and time of collection?		•
d. Place of collection?	-	
e. Parameter(s) requested and preservitives used?		
3. Do they remain legible even if wet?		-
B. Sample Seals		
1. Are sample seals placed on those containers to ensure samples are not altered?		
C. Field Logbook	en de la companya de la companya de la companya de la companya de la companya de la companya de la companya de La companya de la companya de	
1. Is a field logbook maintained?		
2. Does it document the following:	,	
a. Purpose of sampling (e.g., detection or assesment)?		
b. Location of well(s)?	. ,	<del></del>
c. Total depth of each well?		-
d. Static water level depth and measurement technique?		
e. Presence of immiscible layers and detection method?	<del></del>	-
f. Collection method for immiscible layers and sample identification numbers?	,	
g. Well evacuation procedures?	<u> </u>	
h. Sample withdrawal procedure?	•	
i. Date and time of collection?		
j. Well sampling sequence?	<i>-</i>	
k. Types of sample containers and sample identification number(s)?	******	
I. Preservative(s) used?		
m. Parameters requested?	and the second second	
n. Field analysis data and method(s)?	200 100 100 100 100 100 100 100 100 100	
o. Sample distribution and transporter?	· 	1
p. Field observations?	Ì	9/

	Y/I	N
2. Are samples for the following analyses field acidified to pH <2 with HNO <sub>3</sub> :	1	. 1
a. Iron?	11/1	
b. Manganese?	NA	
c. Sodium?		
d. Total metals?	<del>                                     </del>	
e. Dissolved metals?		
f. Fluoride?		
g. Endrin?		
h. Lindane?		-
i. Methoxychlor?	<b>-</b>	
j. Toxaphene?		
k. 2,4, D?		
1. 2,4,5 TP Silvex?		
m. Radium?		
n. Gross alpha?		
o. Gross beta?		
4. Is the sample for TOV analyses field acified to pH <2 with HCl?		-
<ul><li>5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite?</li><li>6. Is the sample for cyanide analysis preserved with NaOH to pH &gt;12?</li></ul>		
. Special Handling Considerations		
1. Are organic samples handled without filtering?		
2. Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample?		
3. Are samples for metal analysis split into two portions?		
4. Is the sample for dissolved metals filtered through a 0.45 micron filter?	Manufactural Lambu Translate	
5. Is the second portion not filtered and analyzed for total metals?		
6. Is one equipment blank prepared each day of ground-water sampling?	V	

	Y/N
2. Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps?	N/A
3. Are sample containers for organics analysis glass bottles with fluorocarbonresin-lined caps?	
4. If glass bottles are used for metals samples are the caps fluorocarbonresin-lined?	
5. Are the sample containers for metal analyses cleanedusing these sequential steps:	
a. Nonphosphate detergent wash?	1.
b. 1:1 nitric acid rinse?	_
c. Tap water rinse?	
d. 1:1 hydrochloric acid rinse?	
e. Tap water rinse?	
f. Distilled/deionized water rinse?	
a. Nonphosphate detergent/hot water wash?  b. Tap water rinse?	
b. Tap water rinse? c. Distilled/deionized water rinse?	. 1
b. Tap water rinse? c. Distilled/deionized water rinse? d. Acetone rinse?	7
b. Tap water rinse? c. Distilled/deionized water rinse?	. , ,
b. Tap water rinse? c. Distilled/deionized water rinse? d. Acetone rinse?	
b. Tap water rinse? c. Distilled/deionized water rinse? d. Acetone rinse? e. Pesticide-grade hexane rinse?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?  c. Chloride?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?  c. Chloride?  d. Phenols?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?  c. Chloride?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?  c. Chloride?  d. Phenols?  e. Sulfate?  f. Nitrate?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?  c. Chloride?  d. Phenols?  e. Sulfate?  f. Nitrate?  g. Coliform bacteria?	
b. Tap water rinse?  c. Distilled/deionized water rinse?  d. Acetone rinse?  e. Pesticide-grade hexane rinse?  7. Are trip blanks used for each sample container type to verify cleanliness?  Sample Preservation Procedures  1. Are samples for the following analyses cooled to 4°C:  a. TOC?  b. TOX?  c. Chloride?  d. Phenols?  e. Sulfate?  f. Nitrate?	

	Y	//N
12. Is sampling equipment thoroughly dry before use?	N/	Ά.
13. Are equipment blanks taken to ensure that sample cross-contamination has not		
occurred?		
14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min?		
F. In-situ or Field Analyses		
1. Are the following labile (chemically unstable) parameters determined in the field:		
a. pH?		
b. Temperature?		
c. Specific conductivity?	- 1	<u>.</u>
d. Redox potential?		-
e, Chlorine?		
f. Dissolved oxygen?		
g. Turbidity?		
h. Other (specify)		<u> </u>
2. For in-situ determinations, are they made after well evacuation and sample removal?		
3. If sample is withdrawn from the well, is parameter measured from a split portion?	1 ,	
4. Is monitoring equipment calibrated according to mannufacturers' specifications and consistent with SW-846?		
5. Is the date, procedure, and maintenance for equipment calibration documented in the field logbook?		
IV. Review of Sample Preservation and Handling Procedures	Na. of	
A. Sample Containers	Ļ,	
1. Are samples transferred from the sampling device directly to their compatible containers?		
		V .

		Y/N
Sample Withdrawal		
l. For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers?	1	1/A
2. Are samples withdrawn with either flurocarbon/resins or stainless steel (316, 304 or 2205) sampling devices?		
3. Are sampling devices either bottom valve bailers or positive gas displacement bladder pumps?		
4. If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer?		
5. If bladder pumps are used, are they operated in acontinuous manner to prevent aeration of the sample?		
5. If bailers are used, are they lowered slowly to prevent degassing of the water?		
7. If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration?		
3. Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well?		
9. If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples?		
10. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps:		
a. Dilute acid rinse (HNO <sub>3</sub> or HC1)?11. If samples are for organic analysis, does the cleaning procedure include the following sequential steps:		
11. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps:		
a. Nonphosphate detergent wash?		ſ
b. Tap water rinse?		
c. Distilled/deionized water rinse?		
d. Acetone rinse?		/
e. Pesticide-grade hexane rinse?		1

	Y	/N
III. Review of Sample Collection Procedures		
A. Measurement of Well Depths /Elevation	<del> </del>	•
1. Are measurements of both depth to standing water and depth to the bottom of the well made?	: N/.	<b>A</b> .
2. Are measurements taken to the 0.01 feet?		
3. What device is used?		
4. Is there a reference point established by a licensed surveyor?		
5. Is the measuring equipment properly cleaned betweenwil locations to prevent cross contamination?		
B. Detection of Immiscible Layers		
1. Are procedures used which will detect light phase immiscible layers?		
2. Are procedures used which will detect heavy phase immiscible layers?		
C. Sampling of Immiscible Layers		
1. Are the immiscible layers sampled separately prior to well evacuation?		
2. Do the procedures used minimize mixing with watersoluble phases?		
D. Well Evacuation		
1. Are low yielding wells evacuated to dryness?		1
2. Are high yielding wells evacuated so that at least three casing volumes are removed?		
3. What device is used to evacuate the wells?		<del>,</del>
4. If any problems are encountered (e.g., equipmentmalfunction) are they noted in a field logbook?		

	Y/N
c. Are the procedures used to make a first determination of contamination adequate?	· N.
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration?	. Y
e. Will the assessment monitoring wells, given site hydrogeologic conditions,	
define the extent and concentration of contamination in the horizontal and	. <b>'</b> Y
vertical planes?	
f. Are the assessment monitoring wells adequately designed and constructed?	UNK.
g. Are the sampling and analysis procedures adequate to provide true measures of contamination?	Y
h. Do the procedures used for evaluation of assessment monitoring data result in	
determinations of the rate of migration, extent of migration, and hazardous	,,
constituent composition of the contaminant plume?	N
i. Are the data collected at sufficient frequency and duration to adequately	
determine the rate of migration?	N
j. Is the schedule of implementation adequate?	Ν
k. Is the owner/operator's assessment monitoring plan adequate?	1
• If the owner/operator had to implement hisassessment monitoring plan, was it	
implemented satisfactorily?	N
<ul> <li>II. Field Evaluation</li> <li>A. Ground-Water Monitoring System</li> <li>1. Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan? (See Section 3.2.3.)</li> </ul>	NA
B. Monitoring Well Construction	
1. Identify construction material material diameter	
a. Primary Casing b. Secondary or outside casing	
2. Is the upper portion of the borehole sealed with conrete to prevent infiltration from the surface?	
3. Is the well fitted with an above-ground protective device?	
4. Is the protective cover fitted with locks to prevent tampering? If a facility utilizes more than a single well design, answer the above questions for each well design?	

	Y/N
b. Were appropriate methods used to establish ground-water flowpaths?	У
c. Did the owner/operator provide accurate documentation?	Ň.
d. Are the potentiometric surface measurements valid?	N
e. Did the owner/operator adequately consider the seasonal and temporal effects on	1
the ground-water?	N
f. Were sufficient hydraulic conductivity tests performed to document lateral and	
vertical variationin hydraulic conductivity in the entire hydrogeologic subsurface	,
below the site?	N
2 11 4 - 'C.	<del>                                     </del>
3. Uppermost Aquifer	. \
a. Did the owner/operator adequately define the upper-most aquifer?	У
	<b></b>
4. Monitoring Well Construction and Design	
a. Do the design and construction of the owner/operator's ground-water monitoring	3 1
wells permit depth discrete ground-water samples to be taken?	1
b. Are the samples representative of ground-water quality?	N
c. Are the ground-water monitoring wells structurally stable?	ý
d. Does the ground-water monitoring well's design and construction permit an	
accurate assessment of aquifer characteristics?	Y
5. Detection Monitoring	
a. Downgradient Wells	
• Do the location, and screen lengths of the ground-water monitoring wells or	unk.
clusters in the detection monitoring system allow the immediate detection of a	
release of hazardous waste or constituents from the hazardous waste	
management area to the uppermost aquifer?	
O. William and and and and and and and and and and	
b. Upgradient Wells	` .
• Do the location and screen lengths of the upgradient (background) ground-	\/
water monitoring wells ensure the capability of collecting ground-water	У.
samples representative of upgradient (background) ground-water quality	
including any ambient heterogenous chemical characteristics?	
5. Assessment Monitoring	
a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration?	Y
	1/
b. Is the detection monitoring system adequately designed and constructed to	1

A Doce the control of	Y/
e. Does the approach employ taking samples during drilling or collecting core	A
samples for further analysis?	1.1
	N
8. Are the indirect methods to be used based on reliable and accepted geophysical techniques?	
techniques?	<b>.</b>
	NA
a. Are they capable of detecting subsurface changes resulting from contaminant	
	N/A
b. Is the measurement at an appropriate level of sensitivity to detect ground-water	NIX
Tarred arranges at the 216.	V
c. Is the method appropriate considering the nature of the subsurface materials?	
and approach consider the limitations of these matheden	Y
e. Will the extent of contamination and constituent concerns in the	Y
and sound engineering judgment? (Using indirect methods to first	
substantiate the findings.)	1 }
Does the assessment approach incorporate any mathe-matical modeling to predict	
contaminant movement?	<u> </u>
a. Will site specific measurements be utilized toaccurately portray the subsurface?	unk.
The court of this picture.	
c. Have the assumptions been identified?	Unk.
d. Have the physical and chemical properties of the site-specific wastes and	unk.
hazardous waste constituentsbeen identified?	Y
Conduction	
Conclusions	
Cultura	
Subsurface geology	
a II-a - co	. 1
a. Has sufficient data been collected to adequately define petrography and	
Langer American American	
b. Has the subsurface geochemistry been adequately defined?	ν
c. Was the bonne/coring program adequate to deseath the	7
of the state of th	
	У
e. Does the geologic assessment address or provide means to resolve any	, /
information gaps?	. Y
Ground-water flowpaths	
Age Age Inabalis	:
a. Did the owner/operator adequately establish the hori-zontal and vertical	<b>V</b> .

	Y/N
a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents?	γ
b. Does the owner/operator provide documentation for he listed wastes which are not included?	WA-
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water?	Ν
4. Has the owner/operator specified a schedule of implementation in the assessment plan?	2
5. Have the assessment monitoring objectives been clearly defined in the assessment plan?	Y
a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurred any of the detection monitoring wells?	Υ
b. Does the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility?	γ
c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water?	γ.
d. Does the plan employ a quarterly monitoring program?	Υ
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase?	
a. Is the role of each method in the evaluation fully described?	N
b. Does the plan provide sufficient descriptions of the direct methods to be used?	N
c. Does the plan provide sufficient descriptions of the indirect methods to be used?	N
d. Will the method contribute to the further characterization of the contaminant movement?	Y
7. Are the investigatory techniques utilized in the assessment program based on direct methods?	Y
a. Does the assessment approach incorporate indirect methods to further support direct methods?	7
b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring?	Ν.
c. Are the procedures well defined?	· · Y .
d. Does the approach provide for monitoring wells similar in design and	\

	399	)U
	Y/N	H.R.D.
H. Evaluation of the Facility's Detection Monitoring Program	The second second	
1 Placement of December 1		
1. Placement of Downgradient Detection Monitoring Wells		
a. Are the ground-water monitoring walls as allowed.	1 /	
a. Are the ground-water monitoring wells or clusters located immediately adjacent to the waste management area?		•
b. How far apart are the detection monitoring wells?  00'-1900'		
c. Does the owner/operator provide a rationale for thelocation of each monitoring		,
well of cluster?	У	- 2 - 1,
d. Does the owner/operator identified the well screenlengths of each monitoring		<b>Carrie</b>
well or clusters?	Y	
e. Does the owner/operator provide an explanation for the well screen lengths of		
each monitoring well orcluster?	N	
f. Do the actual locations of monitoring wells orclusters correspond to those	\/	7
identified by the owner/operator?	1.7	
2. Placement of Upgradient Monitoring Wells		٦
or obbracion Monitoring Wells	was and the second	
a. Has the owner/operator documented the location of each upgradient monitoring		,
well of cluster?	У	
b. Does the owner/operator provide an explanation forthe location(s) of the		4
upgradient monitoring wells?	· >	ſ
c. What length screen has the owner/operator employed in the background	:	1
monitoring well(s)? 10/ into first water- bearing zone	_	
d. Does the owner/operator provide an explanation for the screen length(s) chosen?		1
·	Υ. -	
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator?		1
in the contract of the contrac	X	
I. Office Evaluation of the Facility's Assessment Monitoring Program	-	
1. Does the assessment plan specify:	4.	
	<b>y</b> .	
a. The number, location, and depth of wells?	. · · · ·	
b. The rationale for their placement and identify the basis that will be used to select		
subsequent sampling locations and depths in later assessment phases?	, 7	١.
2. Does the list of monitoring parameters include all hazardous waste constituents		
from the facility?		
	У	

	Y/N
• What are the dimensions of the filter pack?	
unknown	
Has a turbidity measurement of the well water ever been made?	У.
<ul> <li>Have the filter pack and screen been designed for the insitu materials?</li> </ul>	
	<del>                                     </del>
c. Well development	
Was the well developed?	Y
What technique was used for well development?	1.
—Surge block	1
—Bailer	
√Air surging	
✓ Water pumping	
—Other (specify)	
	<del> </del>
4. Annular Space Seals	1:
a. What is the annular space in the saturated zone directlyabove the filter pack	1
filled with:	
Sodium bentonite (specify type and grit) specify	
—Cement (specify neat or concrete)	1
—Other (specify)	
b. Was the seal installed by:	
—Dropping material down the hole and tamping	
—Dropping material down the inside of hollow-stem auger	
—Tremie pipe method	
—Other (specify)	
c. Was a different seal used in the unsaturated zone? If yes,	N
Was this seal made with?	
—Sodium bentonite (specify type and grit)	
—Cement (specify neat or concrete)- Other (specify)	N/A
• Was this seal installed by?	
—Dropping material down the hole and tamping	,
—Dropping material down the inside of hollow stem auger	
—Other (specify)	
d. Is the upper portion of the borehole sealed with a concrete cap to prevent	
infiltration from the surface?	7
e. Is the well fitted with an above-ground protectivedevice and bumper guards?	<del></del>
f. Has the protective cover been installed with locks to prevent tampering?	
•	·
	γ.
	<i>′</i>

A Word Samuel and the same and	Y/N
• Were formation samples collected initially during drilling?	<b>Y</b>
• Were any cores taken continuous?	Y
• If not, at what interval were samples taken?	
• How were the samples obtained?	
—Split spoon	
—Shelby tube	
Core drill  Color (12)	
—Other (specify)	
Identify if any physical and/or chemical tests were performed on the	
formation samples (specify)	
	·N/A
2 Marianing Wall Co.	
2. Monitoring Well Construction Materials	
	** · · ·
a. Identify construction materials (by number) and diameters (ID/OD)	
Material Diameter	ئىرىدىدى بىلىسىمىد دارىدىدى بىلىسىمىدىدى
• Primary Casing PVC 4"	
• Secondary or outside casing steel	
(doubleconstruction)  • Screen  PVC  4"	•
	•
b. How are the sections of casing and screen connected?	
• Pipe sections threaded	Ŋ
Couplings (friction) with adhesive or solvent	N
• Couplings (friction) with retainer screws	У
• Other (specify)	N.
c. Were the materials steam-cleaned prior to installation?	
• If no, how were the materials cleaned?	Y
3 Wall Intoka Daries and Wall D.	
3. Well Intake Design and Well Development	
2. Was a wall intoles comes is as years	` . \/
a. Was a well intake screen installed?	7
• What is the length of the screen for the well?	
a In the comes man feet 10	
Is the screen manufactured?  b. Was a filter pack installed?	Y
	У . ,
• What kind of filter pack was employed?	
<ul> <li>Is the filter pack compatible with formationmaterials?</li> <li>How was the filter pack installed?</li> </ul>	Y
dropped into well and tamped	
- marked was ranched	

	Y/N
d. Does potential for other hydraulic communication exist (e.g., lateral incontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage? If yes or no, what	
is the rationale?	
Regional Fractures in the Brunswick formation	/ .
. Office Evaluation of the Facility's Ground-Water Monitoring System— Monitoring Well Design and Construction:	
These questions should be answered for each different well design present at the	
facility.	•
. Drilling Methods	
a. What drilling method was used for the well?	
• Hollow-stem auger	
• Solid-stem auger	
• Mud rotary	
• Air rotary	
• Reverse rotary	
• Cable tool	ŀ
• Jetting	
• Air drill w/ casing hammer	
Other (specify)	
b. Were any cutting fluids (including water) or additives used during drilling? If	
yes, specify:	`
• Type of drilling fluid	
• Source of water used	
• Foam	MA
• Polymers • Other	
c. Was the cutting fluid, or additive, identified?	NZA
d. Was the drilling equipment steam-cleaned prior to drilling the well?	N/A
• Other methods	Y.
e. Was compressed air used during drilling? If yes,	
• was the air filtered to remove oil?	1//
f. Did the owner/operator document procedure for establishing the potentiometric	
surface? If yes,	·   ~ ~
• how was the location established?	N
g. Formation samples	

	Y/N
e. Did the owner/operator implement means for gauging long term effects on water	
movement that may result from on-site or off-site construction or changes in	
land-use patterns?	N
3. Hydraulic conductivity	
a. How were hydraulic conductivities of the subsurface materials determined?	
• Single-well tests (slug tests)?	
• Multiple-well tests (pump tests)	N.
• Other (specify)	7
b. If single-well tests were conducted, was it done by:	
• Adding or removing a known volume of water?	11/1
• Pressurizing well casing?	N/A
c. If single well tests were conducted in a highly permeable formation, were	N/A
pressure transducers and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording actions and high grand recording action and high grand recording actions and high grand recording action actions and high grand recording actions are actions as a second recording action action actions are actions as a second recording action action actions are actions as a second recording action action actions are actions as a second recording action action actions are actions as a second recording action action action actions are actions as a second recording action acti	,
pressure transducers and high-speed recording equipment used to record the rapidly changing water levels?	. Unk.
d. Since single well tests only measure hydraulic conductivity in a limited area,	
were enough tests run to ensure a representative measure of conductivity in each	N/A =
hydrogeologic unit?	177
e. Is the owner/operator's slug test data (if applicable) consistent with existing	N/m:
geologic information (e.g., boring logs)?	WA
f. Were other hydraulic conductivity properties determined?	У
g. If yes, provide any of the following data, if available:	
• Transmissivity	•
• Storage coefficient	
• Leakage	
• Permeability	,
• Porosity	,
• Specific capacity OUS SPM/A	
• Other (specify)	
1. Identification of the uppermost aquifer	
	,
a. Has the extent of the uppermost saturated zone (aquifer) in the facility area been	<b>Y</b>
defined? If yes,	(
Are soil boring/test pit logs included?	N
Are geologic cross-sections included?	N
b. Is there evidence of confining (competent, unfractured, continuous, and low	
permeability) layers beneath the site? If yes,	Y
how was continuity demonstrated?	
c. What is hydraulic conductivity of the confining unit (if present)? CM/Sec How	,
was it determined? 5x107cm/s to 6.1x107cm/s	

	Y/N
f. Did the owner/operator provide construction details for the piezometers?	I.V
g. How were the static water levels measured (check method[s]).	
• Electric water sounder	
• Wetted tape	
• Air line	
• Other (explain)	
h. Was the well water level measured in wells with equivalent screened intervals at	
an equivalent depth below the saturated zone?	1
i. Has the owner/operator provided a site water table (potentiometric) contour map?	1 1
If yes,	1, 1, . ,
Do the potentiometric contours appear logical and accurate based on	
topography and presented data? (Consult water level data)	y
• Are ground-water flow-lines indicated?	<del></del>
• Are static water levels shown?	Y Y
Can hydraulic gradients be estimated?	<del>-                                    </del>
j. Did the owner/operator develop hydrologic cross sections of the vertical flow	<del>-                                    </del>
component across the site using measurements from all wells?	
k. Do the owner/operator's flow nets include:	N
• piezometer locations?	
• depth of screening?	N
	N
• width of screening?	· N) -
measurements of water levels from all wells and piezometers?	N.
2. Seasonal and temporal fluctuations in ground-water	
a. Do fluctuations in static water levels occur? If yes, are the fluctuations caused by	\/
any of the following:	. (
—Off-site well pumping	
	N
—Tidal processes or other intermittent natural	
variations (e.g., river stage, etc.)	N
—On-site well pumping	N
—Off-site, on-site construction or changing land use patterns	·Ν
—Deep well injection	N
—Seasonal variations	L N
—Other (specify)	N
b. Has the owner/operator documented sources and patterns that contribute to or	
affect the ground-water patterns below the waste management?	Υ,
c. Do water level fluctuations alter the general ground-water gradients and flow	
directions?	Y
d. Based on water level data, do any head differentials occur that may indicate a	
vertical flow component in the saturated zone?	y
	<i>' (</i>

	A. 2 /2 -
· location of borehole?	Y/N
• depth of termination?	N
· location of screen (if applicable)?	N
• depth of zone(s) of saturation?	N
backfill procedure?	IN
3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor?	I N
4. Does the topographic map provide:	
a. contours at a maximum interval of two-feet?	l y
b. locations and illustrations of man-made features (e.g., parking lots, factory	
buildings, drainage ditches, storm drain, pipelines, etc.)?	
c. descriptions of nearby water bodies?	7
d. descriptions of off-site wells?	Y
e. site boundaries?	N/A
f. individual RCRA units?	У
g. delineation of the waste management area(s)?	Y
h. well and boring locations?	Y
D. Did the owner/operator provide an aerial photograph depicting the site and adjacent	
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features?  5. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are those placetimes.	N
off-site features?  Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths	N
5. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?	N
5. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?	N N
5. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?  b. Were the well water level measurements taken within a 24 hourseled.	N N
5. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?  b. Were the well water level measurements taken within a 24 hour period?  c. Were the well water level measurements taken to the research 0.01 feet?	2 2 7
Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?  b. Were the well water level measurements taken within a 24 hour period?  c. Were the well water level measurements taken to the nearest 0.01 feet?  d. Were the well water levels allowed to stabilize after constructions.	N N Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?  b. Were the well water level measurements taken within a 24 hour period?  c. Were the well water level measurements taken to the nearest 0.01 feet?  d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurement.	N Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?  b. Were the well water level measurements taken within a 24 hour period?  c. Were the well water level measurements taken to the nearest 0.01 feet?  d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements?  e. Was the water level information obtained from (check appropriate case)	N N Y Y Y Y Y
Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled?  Identification of Ground-Water Flowpaths  Ground-water flow direction  a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet?  b. Were the well water level measurements taken within a 24 hour period?  c. Were the well water level measurements taken to the nearest 0.01 feet?  d. Were the well water levels allowed to stabilize after constructions.	N N Y Y Y Y

	Y/N
—soil type?	N
approximate bulk geochemistry?	N
existence of microstructures that may effect or indicate fluid flow?	Y
• Falling head tests?	Y
Static head tests?	Y
• Settling measurements?	N
• Centrifuge tests?	N.
Column drawings?	N
D. Verification of Subsurface Geological Data	
1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations?	N
2. Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically low water-bearing units?	Y
3. Is the confining layer laterally continuous across the entire site?	N
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer?	У
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data?	N
6. Do the laboratory data corroborate the field data for petrography?	У
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry?	N/A
E. Presentation of Geologic Data  1. Did the owner/operator present geologic cross sections of the site?	Y
2. Do cross sections:	Y
a. identify the types and characteristics of the geologic materials present?	
b. define the contact zones between different geologic materials?	Y
c. note the zones of high permeability or fracture?	Y
d. give detailed borehole information including:	1
	$\mathbf{I}$

	990V
Auger (hollow or solid stem)	Y/N
Mud rotary	
Reverse rotary	
Cable tool	
Jetting	
Other (specify)	, i
e. Were continuous sample corings taken?	
f. How were the samples obtained (checked method[s])	Υ
• Split spoon	
• Shelby tube, or similar	
• Rock coring	. 1
• Ditch sampling	
• Other (explain)	, ,
g. Were the continuous sample corings logged by a qualified professional in	
geology?	
h. Does the field boring log include the following information:	γ
• Hole name/number?	
Date started and finished?	Y
• Driller's name?	
Hole location (i.e., map and elevation)?	-X
• Drill rig type and bit/auger size?	7
Gross petrography (e.g., rock type) of each geologic unit?	<del>y</del>
Gross mineralogy of each geologic unit?	Y
Gross structural interpretation of each geologic unit and structural features	7
(e.g., fractures, gouge material, solution channels, buried streams or valleys,	
identification of depositional material)?	У .
Development of soil zones and vertical extent and description of soil type?	
Depth of water bearing unit(s) and vertical extent of each?	· · · · · ·
Depth and reason for termination of borehole?	
Depth and location of any contaminant encountered in borehole?	<i>M</i> /n
Sample location/number?	NA.
Percent sample recovery?	
Narrative descriptions of:	7
—Geologic observations?	У
—Drilling observations?	<b>y</b>
i. Were the following analytical tests performed on the core samples:	/
Mineralogy (e.g., microscopic tests and x-ray diffraction)?	N
Petrographic analysis:	
—degree of crystallinity and cementation of matrix?	y .
—degree of sorting, size fraction (i.e., sieving), textural variations?	N
—rock type(s)?	V
	. C., L.

	Y/N
g. Water table/potentiometric map?	У
h. Hydrologic cross sections?	N.
6. Did the owner/operator obtain a regional map of the area and delineate the facility?	
If yes, does this map illustrate:	<del>                                     </del>
a. Surficial geology features?	l y
b. Streams, rivers, lakes, or wetlands near the facility?	У.
c. Discharging or recharging wells near the facility?	y
7. Did the owner/operator obtain a regional hydrogeologic map?	
If yes, does this hydrogeologic map indicate:	1
a. Major areas of recharge/discharge?	1 × V
b. Regional ground-water flow direction?	<del>                                     </del>
c. Potentiometric contours which are consistent with observed water level	7
elevations?	Y
If yes, does the site map show:  2. Regulated units of the facility (e.g., landfill areas impoundments)?	γ,
a. Regulated units of the facility (e.g., landfill areas, impoundments)?	<del>                                     </del>
b. Any seeps, springs, streams, ponds, or wetlands?  c. Location of monitoring wells, soil borings, or test pits?	У. У =
d. How many regulated units does the facility have?	<del>y</del>
If more than one regulated unit then,	
Does the waste management area encompass all regulated units?	N/A
• Is a waste management area delineated for each regulated unit?	WA.
C. Characterization of Subsurface Geology of Site  1. Soil boring/test pit program:	· V
a. Were the soil borings/test pits performed under the supervision of a qualified professional?	\
b. Did the owner/operator provide documentation for selecting the spacing for borings?	Y
c. Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock?	unk.
d. Indicate the method(s) of drilling:	

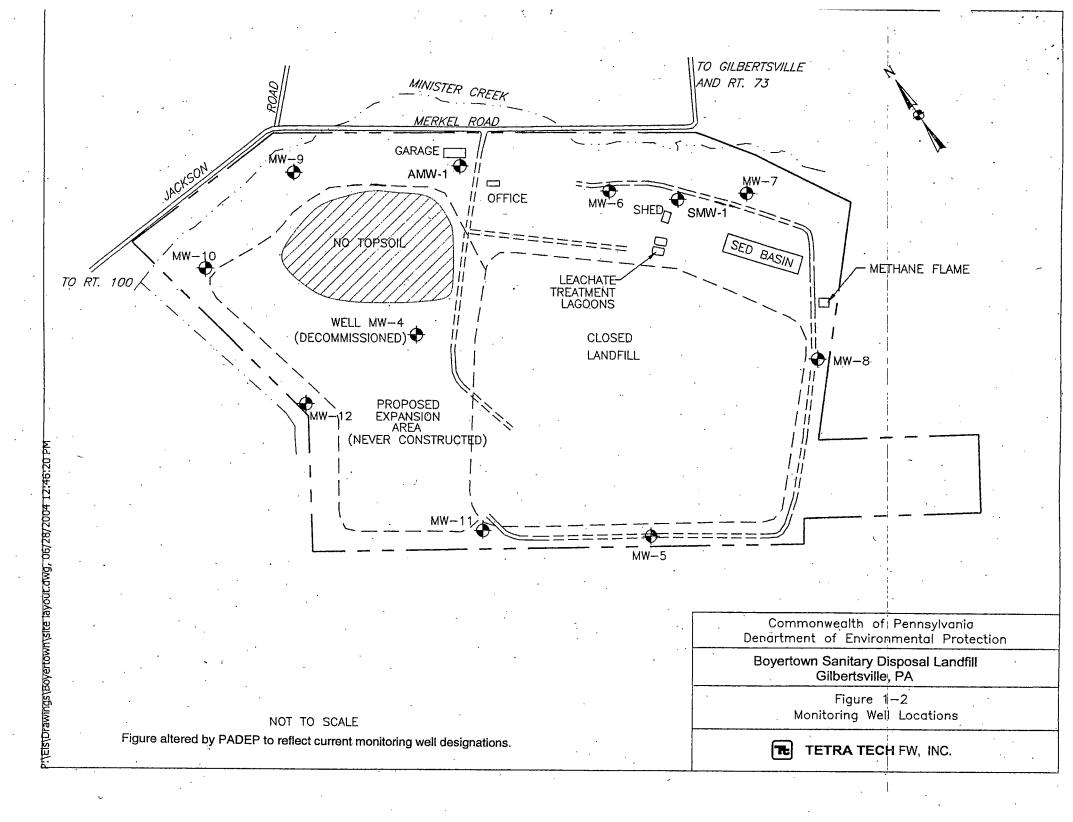
	Y/N
B. Evaluation of the Owner/Operator's Hydrogeologic Assessment	
1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:	
a. Logs of the soil borings/rock corings (documented by a professional geologist, soil lientist, or geotechnical engineer)?	N
b. Materials tests (e.g., grain size analyses, standard penetration tests, etc.)?	IN
c. Piezometer installation for water level measurments at different depths?d. Slug tests?	N
e. Pump tests?	N
i. Geochemical analyses of soil samples?	N.
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis)	N
2. Did the owner/operator use the following indirect technique to supplement direct techniques data:	
a. Geophysical well logs?	N
b. Tracer studies?	N.
c. Resistivity and/or electromagnetic conductance? d. Seismic Survey?	N
e. Hydraulic conductivity measurements of cores?	N.
f. Aerial photography?	. N
g. Ground penetrating radar?	N
h. Other (specify)	N
3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment?	ν
4. Did the owner/operator document methods (criteria) used to correlate and analyze the information?	Υ
5. The owner/operator prepare the following:	
a. Narrative description of geology?	V
b. Geologic cross sections?	N
c. Geologic and soil maps?	N
d. Boring/coring logs?	N
e. Structure contour maps of the differing water bearing zones and confining layer?	N
f. Narrative description and calculation of ground-water flows?	Y

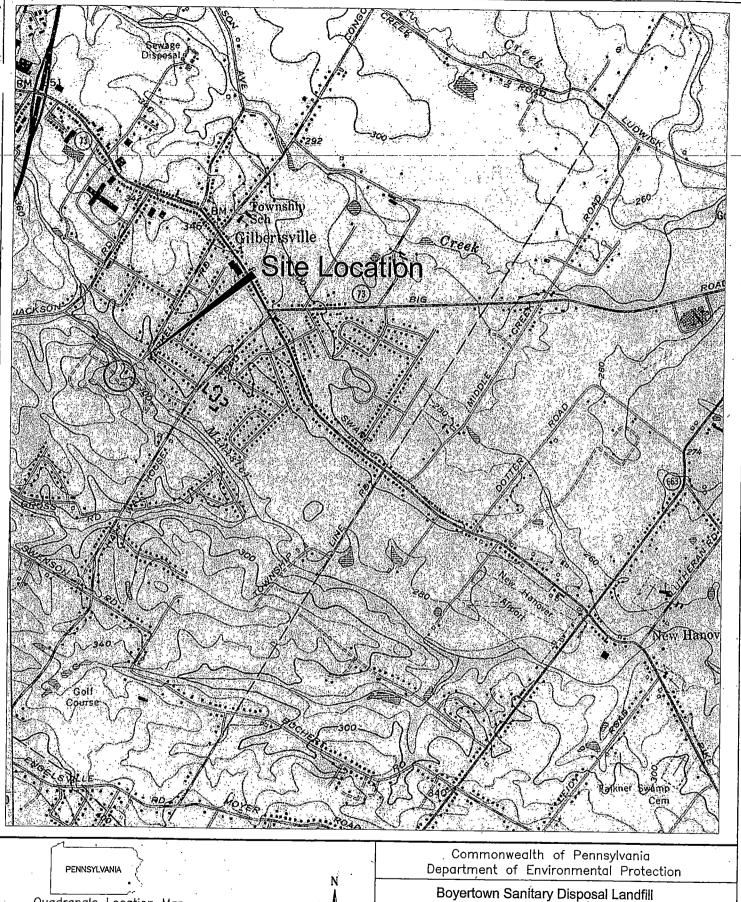
## APPENDIX A

## COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/ technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA. Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using Figure 4.3 from the COG as a guide.

Comprehensive Ground-Water Monitoring Evaluation  I. Office Evaluation Technical Evaluation of the Design of the Ground-Water Monitoring System						
1. What documents were obtained prior to conducting the inspection:						
a. RCRA Part A permit application?	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \					
b. RCRA Part B permit application?						
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups?	Y					
d. Previously conducted facility inspection reports?	У "					
e. Facility's contractor reports?	Ty.					
f. Regional hydrogeologic, geologic, or soil reports?	Y.					
g. The facility's Sampling and Analysis Plan?	Y					
h. Ground-water Assessment Program Outline (or Plan, if thefacility is in assessment monitoring)?	У					
i. Other (specify)Correspondence	Y					





Quadrangle Location Map 2000 4000 Feet Source: U.S.G.S. Topographic Maps (7.5 Minute) Sassamansville, PA Quadrangle

Boyertown Sanitary Disposal Landfill Gilbertsville, PA

> Figure 1-1 Site Location Map

TETRA TECH FW, INC. Formerly Foster Wheeler Environmental Corporation CME Inspection Report: Boyertown Sanitary Disposal Landfill (Gilbertsville, Montgomery County)
Performed on September 11, 2008
Jennifer A. Wilson, Licensed Professional Geologist, PADEP Southeast Regional Office

The Boyertown Disposal Sanitary Landfill, located in Gilbertsville, PA, accepted waste, including some hazardous waste, from the 1970s through 1985. The landfill was finally capped in 1997. There have been many compliance issues at this facility. The landfill is currently in violation, not having conducted quarterly groundwater monitoring as required by its post-closure permit for a number of years. The PADEP was able to hire a contractor, Tetra Tech FW, to conduct a sampling event for a CME in 2004. There has been no groundwater sampling conducted at the facility since then. No sampling was conducted for this CME inspection. PADEP is currently assessing penalties against the owner of the landfill.

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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WASTE MANAGEMENT

## RCRAInfo CM&E EVALUATION - VIOLATION FORM

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